

APPENDIX A

NOTICE OF VIOLATION

Rochester Gas and Electric Corp.  
R. E. Ginna Nuclear Power Plant

Docket No. 50-244  
License No. DPR-18

As a result of the inspection conducted on May 14-18, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. The Ginna Technical Specifications, Section 6.5.2.8, state in part, "...Audits shall encompass...c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months".

Contrary to the above, Audits 83-28:CA and 84-02:CA, conducted to fulfill the TS requirement, did not include Nonconformance Reports (NCRs), a system that addresses the correction of deficiencies found in facility equipment, structures, systems or methods of operation. Examples of such NCRs are G-83-31-93, 110 and 164 that addressed hanger welding, cable supports and calculated stresses for piping.

This is a Severity Level IV violation (Supplement 1).

- B. 10 CFR 50, Appendix B, Criterion II, states in part, "The quality assurance program shall provide control over activities affecting the quality of the identified...components...". Section 1.d of Supplement IV to Technical Supplement Accompanying Application for a Full-Term Operating License (the Quality Assurance Program Description) commits to ANSI N18.7-1972. Paragraph 6.2.1 of this standard states in part, "Access to storage areas shall be controlled and limited only to personnel designated by the responsible organization."

Contrary to the above, access was not controlled to unenclosed Level D storage areas, established by the major onsite contractor, for structural steel, piping and electrical cable reels. Further, an unenclosed Level D storage area for piping, established by the licensee, also did not have controlled access.

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Rochester Gas and Electric Corp. is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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