U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/84-13

Docket No. 50-244

License No. DPR-18 Priority - Category C

Licensee: Rochester Gas and Electric Corporation
49 East Avenue
Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant

Inspection At: Ontario and Rochester, New York

Inspection Conducted: May 14-18,1984

Inspectors: G. Napuda, Lead Reactor Engineer — 7/6/84 date

W. Oliveira, Reactor Engineer — 7/6/84 date

Approved by: A. T. Gody, Chief, Management Programs Section, DETP — 7/9/84 date

Inspection Summary: Inspection on May 14-18, 1984 (Report No. 50-244/84-13)

Areas Inspected: Routine unannounced inspection by two region based inspectors of Quality Assurance Program implementation in the areas of onsite and offsite review committees, storage of items, corrective action system(s), and annual review of program changes. The inspection involved 81 inspector hours onsite and 14 inspector hours at the corporate offices by two region based inspectors.

Results: Two violations were identified in two of the five areas inspected (Failure to control access to Level D storage areas, and failure of the semi-annual audits required by Technical Specifications to include the results of all actions taken to correct deficiencies that affect nuclear safety).

DETAILS

1. Persons Contacted

*C. Anderson, Manager Quality Assurance
*R. Kober, Vice President Electric and Steam Production
*C. Nassauer, Quality Control Supervisor
*C. Peck, Nuclear Assurance Manager
*B. Snow, Superintendent Nuclear Production
*S. Spector, Assistant Station Superintendent
*W. Stiewe, Quality Control Engineer

NRC

*W. Cook, Resident Inspector

The inspectors also held discussions with and interviewed other contractor and licensee administrative, engineering, operations, QA/QC and technical personnel.

*Denotes those present at the exit interview.

2. QA Program Review

The inspectors reviewed the changes made within the past year to the below listed QA Program implementing procedures. The changes were reviewed to verify that they were consistent with the licensee's NRC approved Quality Assurance Program Description Revision 8, (most recent revision dated June, 1983). During conduct of the inspection, discussions were held with licensee personnel to ascertain whether they were aware of and understood the changes.

The following procedures were reviewed:

-- A-201, Administrative and Engineering Staff Responsibilities, Revision 16
-- A-203, Ginna Modification Project Organization, Revision 4
-- A-204, Safety Committee, Revision 0
-- A-1501, Control of Nonconformances, Revision 4
-- A-1502, Nonconformance Reports, Revision 4
-- A-1601, Corrective Action Report, Revision 12
-- A-1801, Response to Internal Audits, Revision 4
-- Charter for the Operation of the Nuclear Safety Audit and Review Board (NSARB), dated December 7, 1978

No violations were identified.

3. QA/QC Administration

3.1 References/Requirements

-- 10 CFR 50, Criteria, I, II and XVIII

-- ANSI N18.7, - 1972, QA Program Requirements (Operations)

-- ANSI N45.2.6 - 1978, Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel

-- Quality Assurance Program Description (QAPD), Revision 8

3.2 Program Review

Selected procedures were reviewed to verify the scope and applicability of the QA Program were defined. QA/QC procedures were appropriately controlled and QA/QC overview responsibilities were assigned.

The auditing function and certain review responsibilities were assigned to a corporate Quality Assurance group that reported to a vice president independent of the electric production/plant operations group. The inspection, QC surveillance (monitoring) and certain review responsibilities were assigned to a QC group that reported to the plant superintendent.

3.3 Implementation

The QC Inspection Log entries for the period July, 1983 to the present and the QC Surveillance Report Log entries between November, 1983 and the present were reviewed in order to ascertain the level of independent inspection effort. Selected inspection and surveillance reports including any corrective actions, were reviewed and discussed with QC personnel to determine the adequacy of these efforts. The qualifications of QC personnel were reviewed and staffing was discussed with responsible supervisors.

3.4 Findings

Four inspectors were assigned to a Project QC Engineer and five inspectors were assigned to a QC Supervisor, both of whom reported to the QC Engineer. These two individuals were RG&E employees while the remainder of the group were contracted personnel. The authorized staffing of this group was stable over the past few years. Additional contracted personnel almost doubled the size of this group during the recent plant outage. Most of the current contracted personnel had been in this group for the past three years and they were appropriately qualified.

The reviewed logs indicated that approximately 656 inspections/surveillances were conducted this year to date. However, there were only a few instances where QC inspected/surveilled actual operating activities, none of which included such things as valve lineups, Control Board status, or operator on-shift activities. The licensee is not committed to conduct a QC overview on these types of activities.

No violations were identified.

4. Corrective Action Systems

4.1 References/Requirements

-- 10 CFR 50, Appendix B, Criteria XV and XVI
-- ANSI N18.7-1972, Quality Assurance Program Requirements (Operations)
-- Technical Specifications (TS) Section 6.5.2.8.c

4.2 Program

The two major methods for identifying, controlling and resolving conditions adverse to quality were Corrective Action Reports (CARs) and Nonconformance Reports (NCRs). Both can be initiated by anyone and their review and processing includes Engineering, QA/QC, the onsite review committee (PORC) and/or the offsite review committee (NSARB) as appropriate. A third independent method is the followup of adverse findings associated with the audit program.

NCRs are normally used for hardware oriented problems and can be escalated to CARs. When a resolution of an identified deficiency requires substantital engineering effort this can be done by means of an Engineering Work Request (EWR) that can close out a report. Reports are reviewed by the PORC and NSARB when required or requested.

Summaries of open CARs and NCRs are provided to various management personnel on a monthly basis. Both types of reports are actively tracked during their processing and resolution.

4.3 Implementation

Documents were reviewed to verify that identified conditions adverse to quality were evaluated to determine appropriate corrective action, action was followed up to assure proper and timely implementation, the prescribed action precluded recurrence of the condition, significant conditions were reviewed by appropriate levels of management and reported to the NRC as required and adherence to established implementing procedures was accomplished.

The following documents were reviewed:

-- Corrective Action Reports (CARs) 1295, 1331, 1340, 1459, 1461, 1507, 1508 and 1516.

-- Nonconformance Reports (NCRs) G-83-25, 31, 93, 110, 112, 121, 124, 137, 148, 160, 164, 173, 177, 178, 186, 188 and G-84-01 and 02.

-- Audit Reports (packages included checklists and field notes) 83-28:CA, Corrective Action Associated with Deficiencies of Items and Operational Methods; and 84-02:CA, QC Inspection, Surveillance and Corrective Action Associated with Deficiencies of Items and Operational Methods.

-- CAR Log and NCR Log

-- CAR Monthly Summary for April, 1984 (open items)

-- NCR Monthly Summary for April, 1984 (open items)

4.4 Findings

4.4.1 The backlogs of open CARs and NCRs were not excessive. RG&E personnel were questioned why some items remained open for longer than average (nine months or more) periods. Discussions and a review of documented justification on why these items were open revealed that the extended time period was reasonable. The bases for resolution of these identified deficiencies were in accordance with established controls and sound technical reasons. Management attention to and review of the CAR/NCR monthly summaries appeared adequate as evidence by the relatively low number of items for which action was overdue (five CARs).

No violations were identified.

4.4.2 A detailed review of the checklists and field notes associated with the two QA Corrective Action Audits indicated that only CARs were considered for the audit sample. Discussions with the auditor confirmed the objective evidence was accurate and complete.

NCRs routinely address the correction of deficiencies found in facility equipment, structures, systems or methods of operation. The following are but a few examples of such documented deficiencies.

-- NCR G-83-31, Unacceptable lug attachment welds on Hangers CCU-488, 490 and 495.

-- NCR G-83-93, Class 2 Spring Cans installed on Cable Supports CVU-65 and 73.

-- NRC G-83-110, Required weld root inspection was not performed on two welds

-- NRC 83-164, Calculated stresses exceed CODE allowables on Linces CVC-160 and -210.

-- NCR G-83-177, Itemized installation discrepancies

The above failure to include all methods of corrective action in the audit sample is contrary to Technical Specification (TS) Section 6.5.2.8.c that states in part, "The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods or operation that affect nuclear safety...." shall be audited at least semi-annually. This is considered a violation of TS requirements (244/84-13-01).

5. Onsite Review Committee

5.1 Implementation

The inspectors attended a major portion of a Plant Operations Review Committee (PORC) meeting and reviewed all the minutes of 1984 meetings to date to determine if committee activities were consistent with Technical Specifications, ANSI N18..7-1972, and licensee procedure A-204, Revision 0, including but not limited to the following:

-- Independent review authority and responsibility

-- Completion of reviews required by TS

-- Membership, alternate members and quorum requirements

-- Meeting frequency, maintenance and distribution of meeting minutes

-- Communication and interface with other groups, such as the offsite review committee.

5.2 Findings

The committee delegates technical reviews to plant personnel. Each review group contains at least one PORC member and documents its results in detail. PORC receives explicit agendas prior to a given meeting. Review packages are available for review by PORC members. Discussions with licensee representatives, reviews of agenda packages

and observation of the PORC meeting indicated that the PORC was fulfilling its review responsibilities. Procedure A-204 requires revision to more clearly describe the manner in which the PORC functions.

No violations were identified.

6. Offsite Review Committee

6.1 Implementation

The inspectors discussed with the Secretary of the Nuclear Safety and Audit Review Board (NSAB) the manner in which the board fulfilled its function and reviewed minutes of NSAB meetings 131 and 133-140. The purpose of this review was to determine if board activities were consistent with TS, ANSI N18.7-1972, and the NSARB Charter including but not limited to the following:

-- Independent review authority and responsibility

-- Completion of TS required reviews

-- Membership, alternate membership, and quorum requirements

-- Meeting frequency, maintenance and distribution of meeting minutes

-- Communication and interface with other groups such as the onsite review committee.

6.2 Findings

The NSARB Secretary compiled a package of items requiring board review and distributes it to each member on a bi-monthly basis. The package generally includes NRC reports, Corrective Action Summaries (CARs), Audit Status Summaries, NRC-IE Bulletins and PORC meeting minutes. An agenda is published approximately two weeks prior to a meeting. The meetings are all day sessions and the minutes are formated to coincide with TS review requirements. Discussions and reviews indicated that the NSARB was fulfilling its review responsibilities and has consistently held meetings in excess of TS minimum requirements.

No violations were identified.

7. Plant Tour

A tour of both the licensee's and major contractor's storage and warehouse areas was conducted to ascertain if the requirements of ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants were being implemented.

The major onsite contractor's Level D laydown areas for structural steel, piping and electrical cable reels, were not enclosed and/or under some form of controlled access. Further, the licensee's laydown area for piping also was not enclosed and did not have controlled access.

This is contrary to 10 CFR 50, Appendix B, Criterion II, which states in part, "The quality assurance program shall provide control over activities affecting the quality of the identified...components...". Revision 8 to Supplement IV to Technical Supplement Accompanying Application for a Full-Term Operating License contains the NRC approved Quality Assurance Program Description (QAOD) that commits to ANSI N45.2.2-1972. This standard states in part, "Access to storage areas shall be controlled and limited only to personnel designated by the responsible organization."

The failure to implement the specified requirements of the Quality Assurance Program is a violation. (244/84-13-02).

8. Management Meetings

Licensee management was informed of the scope and purpose of the inspection at an entrance interview conducted on May 14, 1984. The findings of the inspection were periodically discussed with licensee representatives during the course of the inspection. An exit interview was conducted on May 18, 1984, at the conclusion of the inspection (see paragraph 1 for attendees) at which time the findings were presented to licensee management.

At no time during this inspection was written material provided to the licensee by the inspectors.