



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

August 9, 1984

TELEPHONE  
AREA CODE 716 546-2700

Dr. Thomas E. Murley, Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

**SUBJECT:** Inspection No. 50-244/84-13  
Notice of Violations  
Audit of Corrective Action and Controlled Access for Level D  
Storage Areas  
R. E. Ginna Nuclear Power Plant, Unit No. 1  
Docket No. 50-244

Dear Dr. Murley:

In accordance with the above subject which stated:

"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 stress for piping.

- 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".

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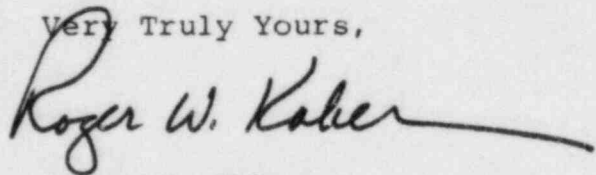
DATE August 8, 1984  
TO Dr. Thomas E. Murley

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.

The following is submitted in response:

- A. The checklist for the semi annual audit of all actions taken to correct deficiencies occurring in facility equipment, structures, systems and methods of operation has been augmented to include Nonconformance Reports (NCRs). This checklist has been implemented in Audit 84-31:CA presently being conducted. Corrective actions completed.
- B. The Quality Assurance Manual and A-1303 Guide Procedure are being revised to clarify the requirement for Level D storage area access control. Storage area perimeter fencing will be installed during the next few months. Completion of the Level D storage area perimeter and related access control additions is expected by December 1, 1984.

Very Truly Yours,



Roger W. Kober

RWK:saj