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TELEPHONE
AREA CODE 716 546-2700

September 28, 1984

Mr. Richard W. Starostecki, Director
Division of Projects and Resident Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 84-16
Notice of Violations
Control Of Limiting Conditions for Operating Equipment
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Starostecki:

In accordance with the above subject which stated

"As a result of the inspection conducted on June 9, 1984, and in accordance with the NRC Enforcement Policy, (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583) the following violation was identified:

Technical Specification 6.8, "Procedures" requires written procedures be established, implemented, and maintained covering activities referenced in Appendix "A" of Regulatory Guide 1.33, November 1972.

Ginna Station Administrative Procedure (A)-52.4, "Control of Limiting Conditions for Operating Equipment", Revision No. 45, June 19, 1984, written pursuant to Technical Specification 6.8, requires Attachment I to A-52.4 to be utilized to document safeguards equipment which is removed from and restored to service, and to ensure the Operations Department is aware of the Limiting Conditions for Operation imposed by Technical Specifications to meet minimum system operability requirements.

Contrary to the above, on July 25, 1984, Attachment I to A-52.4 was not utilized to identify the inoperability of Automatic Deluge System S-29."

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the following is submitted in response.

Corrective action to address this violation is as follows:

The event was discussed at the Shift Supervisor's Meeting on August 28, 1984. It was recognized that valve isolation for the Fire Suppression System was an "off-normal" activity. The routine being, to disable the detection system by disconnection procedure SC-3.16.2.4, and initiate an A-52.4 Attachment I, "Control of Limiting Conditions for Operating Equipment."

The Liaison Engineer for the modification work elected to have isolation valves closed in the same system and a separate A-52.4 attachment should have been utilized, but was not. Clarification was determined necessary for both the A-52.4 Attachment I and SC-3.16.2.4 procedures.

A procedure change has been submitted to A-52.4 Attachment I that states: "For fire suppression systems, if more than one component is deemed inoperable in the same system, use separate A-52.4 attachments".

An addition to the SC-3.16.2.4 procedure directs the operator to list any valves isolated during the disconnection of the fire signaling system.

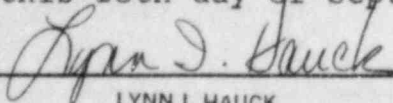
A specific step in the reconnection portion of the procedure directs him to restore the valves listed earlier to normal position, holds removed.

A letter was addressed to the Shift Supervisors advising them to give close scrutiny to an independent verification of the reconnection procedure. Also to personally examine the indications on the Gamewell panel that the detection systems are operable subsequent to reconnection and prior to dismissing the firewatch personnel.

Very Truly Yours,


Roger W. Kober

Subscribed and sworn to me
on this 28th day of September, 1984.



LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1986