

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/84-18

Docket No. 50-244

License No. DPR-18

Priority --

Category C

Licensee: Rochester Gas and Electric Company

49 East Avenue

Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant, Unit 1

Inspection At: Ontario, New York

Inspection Conducted: July 16-20, 1984

Inspectors: *S. V. Pullani*
S. V. Pullani
Fire Protection Engineer

8/8/84
date

Approved by: *C. J. Anderson*
C. J. Anderson, Chief
Plant Systems Section

8/11/84
date

Inspection Summary:

Inspection on July 16-20, 1984 (Report No. 50-244/84-18)

Areas Inspected: Routine unannounced inspection of the Fire Protection/Prevention Program including: program administration and organization; administrative control of combustibles; administrative control of ignition sources; other administrative controls; equipment maintenance, inspection and tests; fire brigade training; periodic inspections and quality assurance audits; and facility tour. The inspection involved 40 inspector-hours on site and 8 inspector-hours in office by one region based inspector.

Results: Of the eight areas inspected, no violations were identified.

DETAILS

1.0 Persons Contacted

1.1 Rochester Gas and Electric Company (RG&E)

- *R. Biedenback, Training Specialist
- S. Bullock, Quality Assurance Engineer
- D. Gent, Results and Test Supervisor
- *T. Harding, Liaison Engineer
- *C. Peck, Nuclear Assurance Manager
- L. Smith, Shift Supervisor
- *B. Snow, Superintendent - Nuclear Production
- S. Spector, Assistant Superintendent
- J. Straight, Fire Protection and Safety Coordinator

1.2 Nuclear Regulatory Commission (NRC)

W. Cook, Senior Resident Inspector (by telephone)

*denotes those present at the exit interview.

2.0 Follow-up of Previous Inspection Findings

(Open) Unresolved Item (50-244/75-21-07): Inadequate Procedural Guidance For Backup Methods Of Orderly Plant Cooldown

The licensee had subsequently developed a number of site contingency and emergency procedures to address the backup methods of orderly plant cooldown in the event of a fire. Included are several prefire strategies for different areas of the plant. Two important prefire strategies are:

- SC-3.20.37, Prefire Strategy for Control Room - Brigade Response, Revision 2
- SC-3.20.37.1, Prefire Strategy for Control Room - Operations Response, Revision 4

The SC-3.20.37.1 procedure, as currently written, addresses only the not shutdown phase of the alternate shutdown. The licensee indicated that this procedure is being revised to include the cold shutdown phase also, and will be available for NRC review within the schedular requirement of 10 CFR 50.48(c). These procedures and the related operator training will be reviewed for their adequacy during a future Appendix R Safe Shutdown inspection.

This item remains open pending the above licensee action and the review by NRC.

(Closed) Unresolved Item (50-244/75-21-10): Cable Tray Installation

Certain cable trays in cable tunnel, cable tray 156 in air handling room, and cable tray 157 in the relay room, had been identified previously (Inspection Report 50-244/75-21) as not covered in accordance with the licensee's cable tray installation specification, Section 7.c.(7). The licensee explained that the covers are intended to protect trays from falling objects. However, the trays are protected by overhead concrete floors from falling objects. Also, the covers, if installed, would obstruct the sprays from installed automatic suppression systems when actuated, and therefore will not serve any real protection purpose. The inspector inspected the cable tray installations and determined that the installations as-is (without covers) are acceptable. This item is resolved.

(Closed) Unresolved Item (50-244/82-17-01): Procedure SC-3.15.5, Emergency Fire Equipment Locker Inventory and Inspections, Revision 12, to be revised to include functional testing of the equipment in the locker.

The licensee subsequently revised the procedure to include the functional testing in Section 3.2.3. The inspector reviewed the latest revision (Revision 20) of the procedure and found it acceptable. This item is resolved.

(Closed) Unresolved Item (50-244/82-17-02): Fire Protection & Safety Coordinator (FPSC) Review of Fire Protection Modification Package 1833

During NRC Inspection 50-244/82-17, the licensee could not provide documentation for FPSC review of the modifications package. During the current inspection, the licensee provided this documentation which was reviewed and found acceptable by the inspector. This item is resolved.

(Closed) Unresolved Item (50-244/82-17-03): Follow-up of Audit 81-32: SB Findings

During the above audit, 22 findings were identified, out of which 12 findings were closed as of previous inspection (50-244/82-17). The remaining 10 findings were then open and being tracked by the licensee. During the current inspection, the licensee provided documentation closing out these 10 findings. This item is resolved.

3.0 Fire Protection/Prevention Program

The inspector reviewed several documents in the following areas of the program to verify that the licensee had developed and implemented adequate procedures consistent with the Fire Hazard Analysis (FHA), Final Safety Analysis Report (FSAR), and Technical Specifications (TS). The documents reviewed, the scope of review, and the inspection findings for each area of the program are described in the following sections.

3.1 Program Administration and Organization

The inspector reviewed the following licensee documents:

- Technical Specifications, Section 6, Administrative Controls
- Administrative Procedure A-201, Ginna Station Administrative and Engineering Staff Responsibilities, Revision 16
- Licensee letter to NRC dated August 14, 1979, L. D. White, Jr. to W. P. Haass, Subject: Information Required to Review Corporate Capabilities

The scope of review was to ascertain that:

- a. Personnel were designated for implementing the program at site; and
- b. Qualifications were delineated for personnel designated to implement the program.

No unacceptable conditions were identified.

3.2 Administrative Control of Combustibles

The inspector reviewed the following licensee documents:

- Administrative Procedure A-804, Bulk Storage of Combustible Materials and Their Use, Revision 5
- Administrative Procedure A-54.7, Fire Protection and Safety Coordinator Tour, Revision 0
- Administrative Procedure A-202, Ginna Station Staff Responsibilities for Fire Protection, Revision 2

The scope of review was to verify that the licensee had developed administrative controls which included:

- a. Special authorization for the use of combustible, flammable or explosive hazardous material in safety-related areas;
- b. Prohibition on the storage of combustible, flammable or explosive hazardous material in safety-related areas;
- c. The removal of all wastes, debris, rags, oil spills or other combustible materials resulting from the work activity or at the end of each work shift, whichever is sooner;
- d. All wood used in safety-related areas to be treated with flame retardant;

- e. Periodic inspection for accumulation of combustibles;
- f. Transient combustibles to be restricted and controlled in safety-related areas; and
- g. Housekeeping to be properly maintained in areas containing safety-related equipment and components.

No unacceptable conditions were identified.

3.3 Administrative Control of Ignition Sources

The inspector reviewed the following licensee documents:

- Administrative Procedure A-905; Open Flame, Welding and Grinding Permit; Revision 8
- Administrative Procedure A-804, Bulk Storage of Combustible Materials and Their Use, Revision 5

The scope of review was to verify that the licensee had developed administrative controls which included:

- a. Requirements for special authorization (work permit) for activities involving welding, cutting, grinding, open flame or other ignition sources and that they are properly safeguarded in areas containing safety-related equipment and components; and
- b. Prohibition on smoking in safety-related areas, except where "smoking permitted" areas had been specifically designated by plant management.

No unacceptable conditions were identified.

3.4 Other Administrative Controls

The inspector reviewed the following licensee documents:

- Technical Specifications, Section 6, Administrative Controls
- Administrative Procedure A-301, Control of Station Modifications, Revision 19
- Administrative Procedure A-302, Preparation, Review and Approval of Design Input Documents for Minor Modifications, Revision 3
- Administrative Procedure A-1603, Maintenance Work Order and Trouble Report, Revision 5
- Administrative Procedure A-103.9, Fire Brigade Training, Revision 3

- Site Contingency Procedure SC-3.3.1, Immediate Fire Notification, Revision 10
- Ginna Station Quality Assurance Manual; Section 18, Revision 10; and Appendix D, Revision 3

The scope of review was to verify that the licensee had developed administrative controls which require that:

- a. Work authorization, construction permit or similar arrangement is provided for review and approval of modification, construction and maintenance activities which could adversely affect the safety of the facility;
- b. Fire brigade organization and qualifications of brigade members are delineated;
- c. Fire reporting instructions for general plant personnel are developed;
- d. Periodic audits are to be conducted on the entire fire protection program; and
- e. Fire protection/prevention program is included in the licensee's QA Program.

No unacceptable conditions were identified.

3.5 Equipment Maintenance, Inspection and Tests

The inspector reviewed the following randomly selected documents to determine whether the licensee had developed adequate procedures which established maintenance, inspection, and testing requirements for the plant fire protection equipment:

- *-- PT-13, Fire Pump Operation and System Alignment, Revision 50
- PT-13.1.3; Star Corporation Heat Detector Zone Testing - Zones Z05, Z18, and Z19DB; Revision 11
- *-- PT-13.4.4; Flood Valve Testing - Suppression System S12, 1A Diesel Generator Preaction System; Revision 12
- *-- SC-3.15.14, Fire Doors, Revision 7
- *-- SC-3.15.15, Emergency Fire Equipment Locker Inventory and Inspection, Revision 20

In addition to reviewing the above documents, the inspector reviewed the maintenance/inspection/test records of the items identified by an asterisk (*) to verify compliance with Technical Specifications and established procedures.

3.6 Fire Brigade Training

3.6.1 Procedure Review

The inspector reviewed the following licensee procedures and documents:

- Administrative Procedure A-103.9, Fire Brigade Training, Revision 3
- Administrative Procedure A-103.8, Emergency Plan Training Program, Revision 6
- LP 83-3, Training Department Lesson Plan, dated June 28, 1983
- LP 84-1, Lesson Plan for Power Plant Fire Fighting, dated January 1984

The scope of review was to verify that the licensee had developed administrative procedures which included:

- a. Requirements for announced and unannounced drills;
- b. Requirements for fire brigade training and retraining at prescribed frequencies;
- c. Requirements for at least one drill per year to be performed on a "back shift" for each brigade;
- d. Requirements for local fire department coordination and training; and
- e. Requirements for maintenance of training records.

No unacceptable conditions were identified.

3.6.2 Records Reviewed

The inspector reviewed training records of fire brigade members for calendar years 1983 and 1984 to ascertain that they had successfully completed the required quarterly training/meeting, semiannual drill, and yearly hands-on fire extinguishment practice.

No unacceptable conditions were identified except as follows:

Semiannual Drill

10 CFR 50, Appendix R, Paragraph I.3.b, requires that drills shall be performed at regular intervals not to exceed 3 months for each shift fire brigade and each fire brigade member should participate in each drill, but must participate in at least 2 drills per year.

Eight out of eighty-eight fire brigade members, in calendar year 1983, did not receive the 2 drill minimum required by Appendix R (they received only 1 drill). However, licensee administrative procedure then in effect (A-103.9, Fire Brigade Training, Revision 2, effective date April 5, 1983, Paragraph 3.3.6) required only 1 drill per year for each member. Thus, the licensee met the procedure then in effect, but did not comply with Appendix R. The licensee subsequently in 1984 revised the A-103.9 procedure to require 2 drills per year in conformance with Appendix R.

The licensee's present position is that they need not comply with Appendix R, Paragraph I.3.b, because the fire brigade training is addressed by the NRC Safety Evaluation Report (SER), dated February 14, 1979, which, in Section 6.2, stated that the licensee's fire brigade training conformed to the NRC guidance document, "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance." Quarterly drills for each shift brigade, among other things, was stated in the SER as the basis for the above conclusion.

10 CFR 50.48(b) exempts those provisions of Appendix R, except Sections III.G, J, and O, if related fire protection features were previously accepted by NRC staff in an SER. The licensee complied with the provisions of accepted NRC staff positions as stated in Section 6.2 of the SER.

Based on the above, and after consultation with the NRC Office of Nuclear Reactor Regulations (NRR), the inspector concurred with the licensee positions. The licensee therefore need not comply with Appendix R Paragraph I.3.b requirement of minimum 2 drills per year for each fire brigade member.

3.7 Periodic Inspections and Quality Assurance Audits

3.7.1 Annual Audit

The inspector reviewed the reports of the following annual audits:

- 81-23:SB, performed on December 2, 1981 - January 7, 1982
- 81-19:SB, performed on June 20 - July 8, 1983

The scope of review was to verify that the audits were performed in accordance with TS 6.5.2.8.h and the audit findings were being resolved in a timely and satisfactory manner.

No unacceptable conditions were identified.

3.7.2 Biennial Audit

The inspector reviewed the report of the following audit:

83-19:SB, performed on June 20 - July 8, 1983.

The scope of this audit included both annual and biennial audit requirements. The review was to verify that the audit was performed in accordance with TS 6.5.2.8.g and the audit findings were being resolved in a timely and satisfactory manner.

No unacceptable conditions were identified.

3.7.3 Triennial Audit

The inspector reviewed the report of the following audit:

FPPA-81, performed during June - July, 1981.

The scope of review was to verify that the audit was performed in accordance with TS 6.5.2.8.i and the audit findings were being resolved in a timely and satisfactory manner.

No unacceptable conditions were identified.

3.8 Facility Tour

The inspector examined fire protection water systems, including fire pumps, fire water piping and distribution systems, post indicator valves, hydrants and contents of hose houses. The inspector toured accessible vital and nonvital plant areas and examined fire detection and alarm systems, automatic and manual fixed suppression systems, interior hose stations, fire barrier penetration seals, and fire doors. The inspector observed general plant housekeeping conditions and randomly checked tags of portable extinguishers for evidence of periodic inspections. No deterioration of equipment was noted. The inspection tags attached to extinguishers indicated that monthly inspections were performed.

No unacceptable conditions were identified.

4.0 Exit Interview

The inspector met with licensee management representatives (see Section 1.0 for attendees) at the conclusion of the inspection on July 20, 1984. The inspector summarized the scope and findings of the inspection at that time.

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