



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

JOHN E. MAIER
Vice President

TELEPHONE
AREA CODE 716 546-2700

February 24, 1983

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Roy Zimmerman
8-264-3311
(315) 524-6935

Subject: Inspection Report No. 50-244/82-23, Item 5.e.3

Dear Mr. Martin:

This letter concerns the alleged violation as stated in Mr. Della Ratta's Inspection Report 50-244/82-23, Item 5.e.3 and subsequently responded to in our letter dated January 11, 1983. Further investigation into this matter has resulted in the following disclosure:

Upon recent review of completed procedure RF-46, dated February 24, 1982, it is noted that the inventory map correctly accounts for all spent fuel assemblies stored in the spent fuel pit. This is in disagreement with Item 5.e.3 as stated above. It appears at present, that the photocopy of the microfiche film used by Mr. Della Ratta for his audit did not exhibit clarity for the particular location A-17. Ginna Station personnel agree that the copy used in the audit and shown to them did not in fact show an assembly at the stated location. Further investigation checked the microfiche documentation against the original hard copy and found both to be in agreement. A-17

It is our wish that the copy used by Mr. Della Ratta in his inspection be further evaluated to resolve this matter. Your cooperation with us in this matter is appreciated.

Very truly yours,

John E. Maier
John E. Maier
Vice President

Attached: Photocopy of Microfiche
Document RF-46

8305050248 830427
PDR ADOCK 05000244
Q PDR

GINNA STATION
January 11, 1983

Mr. Thomas T. Martin, Director
Division of Engineering and
Technical Programs

Subject: Inspection Report No. 50-244/82-23

Dear Mr. Martin:

This letter is in response to the stated violations resulting from an inspection of our facility on November 16-19, 1982, conducted by Mr. A. Della Ratta of your office.

The following is a description of the stated violations. As outlined in Appendix A, Notice of Violation, each of the items listed will be addressed pursuant to the provisions of 10CFR2.201.

- a) The SNM physical inventory of March 24, 1982 was not performed within the required twelve month interval from the previous SNM physical inventory performed on July 11, 1980.

This item correctly identifies a violation of 10CFR70.51(a). This code is referenced in our procedure titled "Special Nuclear Material Physical Inventory", RF-46 Rev. 3, however, it did not state the time span between inspection intervals. To correct this situation, a permanent change has been submitted for procedure RF-46 to explicitly specify the twelve month inventory requirement of 10CFR70.51(d). This procedure change will add a precaution statement as follows:

"This inventory will normally be performed at approximately six month intervals, but at no time to exceed a twelve month interval. Log completion date of last inventory inspection".

Since the SNM physical inventory of March 24, 1982 is still in compliance of 10CFR70.51(d), no immediate corrective action has to be taken at this time. This SNM physical inventory however, will be performed prior to the March 24, 1983 requirement.

- b) A SNM physical inventory was not performed at the termination of the last refueling that had been completed on June 16, 1981.

This violation resulted from an administrative oversight with regards to procedure RF-46 Rev. 3. By initiating the procedure change as noted in (a) above, the shortened time intervals will lessen the possibility of violating the requirements of 10CFR70.51(d).

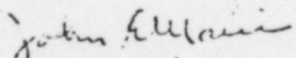
8302090441

January 11, 1983
Mr. Thomas T. Martin, Director
Division of Engineering and
Technical Programs

- c) The results of the March 24, 1982 SNM physical inventory of the Spent Fuel Storage were not compared to the fuel status record of each fuel assembly. The Spent Fuel Storage map recorded a total of 283 fuel assemblies in storage when, in fact, a total of 234 fuel assemblies were in storage. Fuel assembly No. L-11 had not been recorded in the SF A-17 location during the SNM physical inventory.

This violation resulted from personnel error involving the total inventory existing in the Spent Fuel Storage. The above description of the violation incorrectly states that the inventory was not compared to the fuel status record for each fuel assembly. The fuel status records were in fact compared, however, due to personnel oversight, the specific location SFA-17 was not recorded. To alleviate this condition, the recommendation of Mr. Della Ratta will be incorporated to compare the total S.F.A. as existing on the fuel status records to the total checked on the inventory sheet of RF-46. This bottom line comparison will be a checks and balance on the existing one-to-one comparison technique. This procedure change has been submitted for permanent change along with the change noted in (a).

Sincerely,


John E. Maier
Vice President
Electric and Steam Production