

December 29, 1999

Dr. Robert C. Mecredy  
Vice President, Ginna Nuclear Operations  
Rochester Gas and Electric Corporation  
89 East Avenue  
Rochester, New York 14649

SUBJECT: NRC INTEGRATED INSPECTION REPORT 05000244/99011

Dear Dr. Mecredy:

On December 12, 1999, the NRC completed an inspection at your R. E. Ginna nuclear power plant. The enclosed report presents the results of that inspection. Preliminary results and conclusions were presented to RG&E management led by Mr. J. Widay of your staff in an exit meeting on December 16.

During the six weeks covered by this inspection report, your conduct of activities at the Ginna facility was generally characterized by safety-conscious operations, sound engineering and maintenance practices, and careful radiological work controls. Your onsite safety review committee activities following two emerging plant issues were appropriately focused on plant and personnel safety. Your performance in the radioactive liquid and gaseous effluent control programs was found to be effective.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

Original Signed by:

Michele G. Evans, Chief  
Projects Branch 1  
Division of Reactor Projects

Docket No.: 05000244  
License No: DPR-18

Enclosure: Inspection Report 05000244/99011

Robert C. Mecredy

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C. Donaldson, Esquire, State of New York, Department of Law

N. Reynolds, Esquire

F. William Valentino, President, New York State Energy Research  
and Development Authority

J. Spath, Program Director, New York State Energy Research  
and Development Authority

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REGION I

License No. DPR-18

Report No. 05000244/99011

Docket No. 05000244

Licensee: Rochester Gas and Electric Corporation (RG&E)

Facility Name: R. E. Ginna Nuclear Power Plant

Location: 1503 Lake Road  
Ontario, New York 14519

Inspection Period: November 1, 1999 through December 12, 1999

Inspectors: H. K. Nieh, Senior Resident Inspector  
C. R. Welch, Resident Inspector  
J. C. Jang, Senior Radiation Specialist

Approved by: M. G. Evans, Chief  
Projects Branch 1  
Division of Reactor Projects

## EXECUTIVE SUMMARY

### R. E. Ginna Nuclear Power Plant NRC Integrated Inspection Report 05000244/99011

This integrated inspection included aspects of licensee operations, engineering, maintenance, and plant support. The report covers a 6-week period of resident inspection, and it includes the results of an announced inspection by a regional radiological effluents specialist.

#### Operations

In general, the conduct of operations was professional and safety-conscious. Ginna's plant operations review committee thoroughly evaluated two emergent plant issues, and recommended sound corrective actions. The action report screening committee appropriately reviewed other plant issues that were documented through the corrective action program (Sections O1.1 and O7.1).

The preferred and standby auxiliary feedwater (SAFW) systems were capable of performing their safety functions. Overall material condition of the systems was good. However, RG&E personnel did not properly update an associated system alignment procedure to reflect current SAFW system configuration (Section O2.1).

#### Maintenance

RG&E personnel effectively performed selected maintenance and surveillance activities in accordance with approved procedures and station requirements (Section M1.1).

Immediate and planned corrective actions for a previously identified deficiency in the control room ventilation system were adequate (Section M8.1).

#### Engineering

Engineering department personnel appropriately developed and evaluated a modification to the control room envelope (Section E2.1).

#### Plant Support

RG&E maintained adequate radioactive liquid and gaseous effluent control programs. The offsite dose calculation manual contained sufficient detail for acceptable implementation of the radioactive effluent control programs (Section R1.1).

RG&E maintained and implemented an adequate radiation monitoring system calibration program and an effective surveillance test program for effluent air cleaning systems (Section R2).

## Executive Summary (cont'd)

Quality assurance audit and self-assessment programs for radioactive effluent control were effectively implemented. The quality control program for analytical results was effective (Section R7).

RG&E's corrective measures to evaluate and prevent unauthorized external access to onsite computer systems were appropriate (Section S8.1).

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- Attachment 1 - Partial List of Persons Contacted  
- Inspection Procedures Used  
- Items Opened, Closed, and Discussed  
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## Report Details

### Summary of Plant Status

The plant began the inspection period at full power. On November 12, 1999, operators reduced power to approximately 50 percent to perform scheduled maintenance activities. Full power operation resumed on November 13, and continued through the end of the period.

## I. Operations

### **O1 Conduct of Operations**

#### O1.1 General Comments (71707)

The inspectors conducted frequent observations of ongoing plant operations, including control room walkdowns, log reviews, and shift turnovers. The inspectors also conducted numerous plant tours to observe equipment operation and personnel working in the field. In general, the conduct of operations was professional and safety-conscious. Control room operators properly controlled changes in plant power level to support scheduled maintenance activities on the weekend of November 12, 1999.

### **O2 Operational Status of Facilities and Equipment**

#### O2.1 Engineered Safety Feature Walkdown

##### a. Inspection Scope (71707)

The inspectors did a detailed walkdown of accessible portions of the auxiliary feedwater (AFW) system to verify its operability.

##### b. Observations and Findings

The AFW system is made up of a preferred and a standby system. The preferred AFW system is automatically initiated and consists of two motor-driven pumps and one turbine-driven pump. The standby AFW (SAFW) system provides alternate system capability following a high-energy line break event that could render the preferred AFW system inoperable. The SAFW system consists of two motor-driven pumps and must be manually initiated.

Overall, the material condition of the AFW system appeared good. Circuit breaker enclosures for all motor-driven pumps were free of dirt and debris, with no observable deficiencies. The inspectors noted age-related wear of a few components. These issues had been entered in the corrective action program and did not affect system operability.

The inspectors found the preferred AFW system to be properly aligned for automatic initiation according to the associated system alignment procedure. The SAFW system was also verified to be adequately aligned for manual initiation. However, the inspectors noted that motor-operated valve (MOV) 9704B, a stop check valve in the flow path to the B steam generator, was being maintained closed due to a previously identified



deficiency. Although this position was contrary to that described in alignment procedure, S-30.5, "Standby Auxiliary Feedwater Pump Valve and Breaker Position Verification," it did not adversely impact SAFW operability. Nonetheless, the inspectors determined that RG&E personnel did not follow station requirements for initiating an appropriate procedure change to account for MOV-9704B's new position. This was considered a violation of minor significance, and is not subject to formal enforcement action. RG&E personnel acknowledged this finding and initiated an action report (99-1626) to address this issue.

c. Conclusions

The preferred and standby auxiliary feedwater (SAFW) systems were capable of performing their safety functions. Overall material condition of the systems was good. RG&E personnel did not properly update an associated system alignment procedure to reflect current SAFW system configuration.

**O7 Quality Assurance in Operations**

O7.1 Problem Resolution Activities

d. Inspection Scope (71707, 40500)

The inspectors observed the following activities to assess their effectiveness in evaluating and resolving plant issues.

- Plant operations review committee (PORC) meetings.
- Daily action report (AR) screening committee meetings.

b. Observations and Findings

PORC

Several days before a scheduled power reduction for maintenance, operations department personnel raised a concern regarding the plant's ability to withstand a turbine trip during main condenser inspections. Plant power level was intended to be maintained just below 50 percent during the condenser inspections. At that level, the automatic reactor trip following a turbine trip is disabled by design since the turbine steam bypass system is available for removing reactor heat. However, operators questioned the capability of the bypass system because two of the four condensers used by the system would have their cooling water flow isolated for the inspections. The PORC promptly convened to evaluate the concern. Based on operational experience and engineering evaluations, the committee recommended that plant power level be maintained just above 50 percent during the performance of the condenser inspections with the noted automatic reactor trip enabled. Additionally, the PORC suggested that a turbine trip at the recommended plant condition (i.e., just above 50 percent power, automatic reactor trip enabled, and two condensers out of service) be modeled in the simulator to evaluate the plant's response. RG&E subsequently completed the scheduled power reduction and maintenance activities using the PORC's

recommendations without incident.

Another issue that the PORC reviewed involved reactor coolant leakage detection systems inside containment. During the inspection period, control room operators noted that the containment sump level indication had not changed for several days. This level normally increases over time due to condensation of air humidity by the containment recirculation fan coolers. Operators questioned the operability status of the sump level monitoring system based on this indication and a previous problem with the sump pump's automatic starting circuit. Operations and engineering departments' personnel determined that the sump level indicators were operable based on recent calibration results, and validated the steady trend by analyzing plant operating data. The PORC agreed with the operability determination. The committee also recommended against a containment entry at power to troubleshoot the sump pump starting circuit since another way of troubleshooting, involving less radiological consequence to plant personnel, was available. The inspectors concluded that RG&E's actions for this issue were consistent with guidance set forth in NRC Generic Letter 91-18 pertaining to equipment operability.

#### AR Screening Committee

The inspectors used procedure IP-CAP-1, "Action Report," as a reference for evaluating the screening committee's performance in reviewing, prioritizing, and assigning ARs. The committee thoroughly reviewed new ARs for completeness, and often identified minor errors. Preliminary cause codes were determined, and accurately tracked in the operational review department's database. The committee determined priority levels in accordance with procedure IP-CAP-1, and assigned evaluation responsibilities appropriately.

#### c. Conclusions

Ginna's plant operations review committee thoroughly evaluated two emergent plant issues, and recommended sound corrective actions. The action report screening committee appropriately reviewed other plant issues that were documented through the corrective action program.

## **II. Maintenance**

### **M1 Conduct of Maintenance**

#### M1.1 General Comments

##### a. Inspection Scope (61726, 62707)

The inspectors watched all or portions of the following maintenance and surveillance activities:

- WO 19701218, replace instrument air line for AFW valves AOV-4310 and 4481
- WO 19900904, standby AFW valve MOV-9701B diagnostic testing
- WO 19902169, standby AFW pump room cooler inspection

- WO 19900984, calibrate RHR valve HCV-625
- WO 19902556, repair feedwater flow transmitter FT-503
- PT-12.1, A emergency diesel generator monthly test
- PT-32B, B reactor trip breaker logic testing
- PT-16Q-A, A auxiliary feed water pump quarterly test

b. Observations, Findings, and Conclusions

RG&E personnel effectively performed the above stated maintenance and surveillance activities in accordance with approved procedures and station requirements. Additionally, the inspectors performed an in-depth review of the B reactor trip breaker testing, and concluded that the test procedure adequately satisfied technical specification requirements. Minor deficiencies identified during the testing were entered into the corrective action program.

**M8 Miscellaneous Maintenance Issues**

- M8.1 (Closed) Licensee Event Report (LER) 05000244/99011: small breach in ventilation system results in plant being outside design basis. This issue was previously reviewed in NRC inspection report 05000244/99008 (Section M2.1). The inspectors conducted additional inspection this period through review of this LER and RG&E's associated root cause analysis. RG&E determined the most likely cause of the event was a heavy load being placed on the flexible duct work. Additional corrective actions include a detailed examination of the damaged duct work following replacement during the next refueling outage. RG&E's immediate and planned corrective actions were adequate.

**III. Engineering**

**E2 Engineering Support of Facilities and Equipment**

E2.1 Control Room Envelope Modification

a. Inspection Scope (37551, 62707)

The inspectors reviewed RG&E's method for creating new penetrations in the control room habitability envelope to upgrade the control room toxic gas monitor (CRTGM). The inspectors also observed portions of the work associated with the modification.

b. Observations and Findings

As part of the CRTGM upgrade, engineering department personnel developed a necessary modification to the control room envelope for routing electrical cables. The method for creating the penetrations did not compromise control room envelope integrity, which is required by Ginna's technical specifications. RG&E personnel fabricated a casing containing capped electrical conduits, and welded it to the outside surface of the control room wall to create an extension of the control room envelope. The exact locations of the penetrations were marked on the opposite side of the wall (inside the control room) so the actual cuts in the wall would be enclosed by the outside

casing. Prior to removing the conduit caps and routing the electrical cables, maintenance department personnel filled the conduits with appropriate sealing material. The inspectors verified that the penetrations were installed as designed, and that post modification testing adequately ensured the integrity of the control room envelope. The inspectors also reviewed the associated 10 CFR 50.59 safety review and did not note any problems.

c. Conclusions

Engineering department personnel appropriately developed and evaluated a modification to the control room envelope. Associated maintenance activities were properly performed.

#### IV. Plant Support

### **R1 Radiological Protection and Chemistry (RP&C) Controls**

#### **R1.1 Implementation of the Radioactive Liquid and Gaseous Effluent Control Programs**

a. Inspection Scope (84750-01)

Inspection of this area consisted of:

- (1) review of radioactive liquid and gaseous effluent release permits;
- (2) review of selected effluent control procedures;
- (3) review of the 1997 and 1998 Annual Radioactive Effluent Reports;
- (3) review of the offsite dose calculation manual (ODCM); and
- (4) review of overall radioactive effluent program implementation.

The inspector also performed tours of the control room; selected radioactive gas processing facilities and equipment; and the effluent and process radiation monitoring system (RMS).

b. Observations and Findings

During this inspection, all technical specifications (TS)/ODCM required effluent radiation monitors and air cleaning systems were operable.

Effluent control procedures were detailed, easy to follow, and incorporated TS/ODCM requirements. Radioactive liquid and gaseous effluent release permits were complete, and included projected dose calculations to the public, as required by the TS/ODCM.

The ODCM provided descriptions of the sampling and analysis programs, which were established for quantifying radioactive effluent activities, and for calculating projected doses to the public. All necessary parameters, such as effluent radiation monitor setpoint calculation methodologies, and site-specific dilution factors, were listed.

The inspector noted that the ODCM was continuously being updated to improve its contents and hierarchy. In November 1999, RG&E classified the ODCM as a chemistry procedure, and is currently pursuing the use of administrative controls consistent with those used for TS.

The 1997 and 1998 annual radioactive effluent reports provided data indicating total radioactivity released for liquid and gaseous effluents. An assessment of the projected maximum individual doses resulting from radioactive airborne and liquid effluents was included, as required. Projected doses to the public were well below the TS/ODCM limits. The reports contained no anomalous measurements, omissions or adverse trends.

The inspector reviewed RG&E's method for monitoring and quantifying airborne tritium release from the spent fuel building. This method assumes that this tritium release results largely from spent fuel pool (SFP) water evaporation discharged through the plant vent. Changes in SFP makeup water inventory are used to determine the total water loss from the SFP. RG&E calculated the SFP airborne tritium release from January 1 through June 30, 1998 to be about 10 curies. The inspector determined that the licensee's assumptions and calculation methodologies were valid and that the airborne tritium monitoring program was acceptable.

c. Conclusions

RG&E maintained adequate radioactive liquid and gaseous effluent control programs. The offsite dose calculation manual contained sufficient detail for acceptable implementation of the radioactive effluent control programs.

**R2 Status of RP&C Facilities and Equipment**

**R2.1 Calibration of Radiation Monitoring Systems**

a. Inspection Scope (84750-01)

The inspector reviewed the most recent calibration results for the following:

- control room noble gas monitor (R-1);
- containment purge noble gas monitors (R-12 and R-12A);
- plant vent noble gas monitors (R-14 and R-14A);
- condenser air ejector monitors (R-15A and R-15A);
- component cooling water monitor (R-17);
- containment fan coolers monitor (R-16);
- liquid waste disposal monitor (R-18) ;
- turbine building floor drain monitor (R-21); and

- steam generator blowdown monitor (R-19).

b. Observations and Findings

The instrument and controls department had the responsibility for performing the calibrations of the above radiation monitors. All reviewed calibration results were within established acceptance criteria.

The inspector discussed radiation monitoring system (RMS) maintenance and operability with the associated system engineer and members of the chemistry/radiation protection staff. From these interviews, the inspector determined that these individuals had good knowledge of the RMS relative to operability requirements and performance history. The inspector noted that RG&E was updating calibration procedures to obtain reliable conversion factors and to track important items of the effluent radiation monitoring systems.

c. Conclusions

RG&E maintained and implemented an adequate radiation monitoring system calibration program.

R2.2 Air Cleaning Systems

a. Inspection Scope (84750-01)

The inspector reviewed recent surveillance test results (visual inspections, in-place HEPA/charcoal filter leak tests, air capacity tests, pressure drop tests, and laboratory tests for the iodine collection efficiencies) for the following systems, as required by section 5.5.10 of technical specifications (TS):

- control room emergency air treatment system;
- containment air recirculation system;
- containment post-accident charcoal system; and
- spent fuel pool charcoal adsorber system.

The inspector also reviewed selected actions taken in response to NRC Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal."

b. Observations and Findings

All surveillance test results were within TS acceptance criteria. RG&E tested their charcoal filters using ASTM D3803-1989 methodologies to comply with GL 99-02. The inspector noted that the responsible RG&E staff had appropriate knowledge of surveillance testing and GL 99-02 requirements.

c. Conclusions

RG&E implemented and maintained an effective routine surveillance test program for effluent air cleaning systems.

**R7 Quality Assurance in Radiological Protection and Chemistry Activities**

a. Inspection Scope (84750-01)

The inspectors reviewed: (1) the 1998 and 1999 self-assessments and a 1999 quality assurance (QA) audit; (2) the QA policy of the measurement laboratory; and (3) the implementation of the measurement laboratory quality control (QC) program for radioactive liquid and gaseous effluent samples.

b. Observations and Findings

The scope and depth of the 1998 and 1999 self-assessments and the 1999 QA audit were acceptable. The QA Audit identified minor weaknesses in the area of radioactive liquid and gaseous effluent control programs. None of the QA findings were assessed to have regulatory significance.

The QC program consisted of measurements of spike samples through a vendor-supplied service. RG&E stated that blind and duplicate samples will be introduced to enhance laboratory QA/QC in the near future. No significant discrepancies were evident from QC data for interlaboratory comparisons. When minor discrepancies were found, RG&E implemented effective corrective actions.

c. Conclusions

Quality assurance audit and self-assessment programs for radioactive effluent control were effectively implemented. The quality control program for analytical results was effective.

**S8 Miscellaneous Security and Safeguards Issues**

S8.1 Computer System Upgrades

a. Inspection Scope (40500, 71750, 71707)

The inspectors reviewed and verified RG&E's corrective actions to prevent potential unauthorized offsite access to computer systems at the Ginna station.

b. Observations and Findings

RG&E assembled a comprehensive team that included personnel from the computer systems, information services, and security departments. The team determined that only the plant process computer system (PPCS) was vulnerable to unauthorized offsite access, and that no computer systems containing safeguards information could be

accessed from offsite locations. At the Ginna station, the PPCS is used solely for monitoring various plant parameters, such as temperatures, pressures, etc. The PPCS cannot be used for any plant control functions. The inspectors verified that RG&E personnel took appropriate measures to deactivate offsite modem access to the PPCS.

c. Conclusions

RG&E's corrective measures to evaluate and prevent unauthorized external access to onsite computer systems were appropriate.

### **V. Management Meetings**

#### **X1 Exit Meeting Summary**

After the inspection was concluded, the inspectors presented the results to members of licensee management on December 16, 1999. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.



ATTACHMENT I

PARTIAL LIST OF PERSONS CONTACTED

Licensee

|              |   |
|--------------|---|
| J. Widay     | VP, Plant Manager                           |
| T. Alexander | Operational Review Manager                  |
| P. Bamford   | Reactor Engineering Manager                 |
| A. Butcavage | System Engineer                             |
| G. Graus     | I&C/Electrical Maintenance Manager          |
| G. Hermes    | Acting Primary Systems Engineering Manager  |
| J. Hotchkiss | Mechanical Maintenance Manager              |
| G. Joss      | Results and Test Supervisor                 |
| F. Mis       | Principal Health Physicist                  |
| R. Popp      | Production Superintendent                   |
| J. Pacher    | Electrical Systems Engineering Manager      |
| R. Ploof     | Secondary Systems Engineering Manager       |
| P. Polfleit  | Nuclear Emergency Planner                   |
| J. Smith     | Maintenance Superintendent                  |
| W. Thomson   | Chemistry & Radiological Protection Manager |
| T. White     | Operations Manager                          |
| G. Wrobel    | Nuclear Safety & Licensing Manager          |

INSPECTION PROCEDURES USED

IP 37551: Onsite Engineering  
IP 40500: Effectiveness of Licensee Controls in Identifying, Resolving, and Preventing Problems  
IP 61726: Surveillance Observation  
IP 62707: Maintenance Observation  
IP 71707: Plant Operations  
IP 71750: Plant Support  
IP 84750: Radioactive Waste Treatment and Effluent and Environmental Monitoring  
IP 92700: Onsite Follow-up of Written Reports of Nonroutine Events at Power Reactor Facilities

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

LER 1999-011      Small breach in ventilation system results in plant being outside design basis

Discussed

None

## LIST OF ACRONYMS USED

|       |   |
|-------|---|
| AFW   | Auxiliary Feedwater                       |
| AOV   | Air Operated Valve                        |
| AR    | Action Report                             |
| ASTM  | American Society for Testing of Materials |
| CFR   | Code of Federal Regulations               |
| CRTGM | Control Room Toxic Gas Monitor            |
| FT    | Flow Transmitter                          |
| GL    | Generic Letter                            |
| HCV   | Hand Control Valve                        |
| HEPA  | High Efficiency Particulate               |
| IP    | Inspection Procedure                      |
| IR    | Inspection Report                         |
| LER   | Licensee Event Report                     |
| MOV   | Motor-Operated Valve                      |
| NRC   | Nuclear Regulatory Commission             |
| ODCM  | Offsite Dose Calculation Manual           |
| PORC  | Plant Operations Review Committee         |
| PPCS  | Plant Process Computer System             |
| PT    | Periodic Test                             |
| QA    | Quality Assurance                         |
| QC    | Quality Control                           |
| RHR   | Residual Heat Removal                     |
| RG&E  | Rochester Gas and Electric Corporation    |
| RMS   | Radiation Monitoring System               |
| RP&C  | Radiological Protection and Chemistry     |
| SAFW  | Standby Auxiliary Feedwater               |
| SFP   | Spent Fuel Pool                           |
| TS    | Technical Specifications                  |
| WO    | Work Order                                |