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

SUBJECT: R. E. GINNA - NRC INSPECTION REPORT 50-244/02-02

Dear Dr. Mecredy:

On March 30, 2002, the NRC completed an inspection of your R. E. Ginna facility. The enclosed report documents the inspection findings which were discussed on April 2, 2002, with Mr. Joseph Widay and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, the inspectors identified one issue of very low safety significance (Green) which was determined to involve a violation of NRC requirements. However, because of the very low safety significance and because the issue has been entered into your corrective action program, the NRC is treating this issue as a non-cited violation, in accordance with Section VI.A.1 of the NRC's Enforcement Policy. If you deny the non-cited violation, you should provide a response with the basis of your denial, within 30 days of the date of this inspection report, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001; with copies to the Regional Administrator, Region 1; the Director, Office of Enforcement; and the NRC Resident Inspector at the Ginna facility.

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued an advisory recommending that nuclear power plant licensees go to the highest level of security, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants remain at the highest level of security and the NRC continues to monitor the situation. This advisory was followed by additional advisories, and although the specific actions are not releasable to the public, they generally include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with law enforcement and military authorities, and more limited access of personnel and vehicles to the sites. The NRC has conducted various audits of your response to these advisories and your ability to respond to terrorist attacks with the capabilities of the current design basis threat (DBT). On February 25, 2002, the NRC issued an Order to all nuclear power plant licensees, requiring them to take certain additional interim compensatory measures to address the generalized high-level threat environment. With the issuance of the Order, we will evaluate Rochester Gas and Electric Corporation's (RG&E) compliance with these interim requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publically Available Records (PARS) component of the NRC's document management system (ADAMS). ADAMS is accessible from the NRC website in the Public Electronic Reading Room, http://www.nrc.gov/reading-rm/adams.html.

Sincerely,

/RA/

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

Docket No. 50-244 License No. DPR-18

Enclosure: Inspection Report 50-244/02-02

Attachment 1: Supplemental Information

Attachment 2: TI 2515/145 - Circumferential Cracking of Reactor Pressure Vessel Head

Penetration Nozzles Reporting Requirements

cc w/encl: P. Wilkens, Senior Vice President, Generation

P. Eddy, Electric Division, Department of Public Service, State of New York

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

N. Reynolds, Esquire

W. Flynn, President, New York State Energy Research and Development Authority

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

D. Stenger, Ballard Spahr Andrews and Ingersoll. LLP

T. Wideman, Director, Wayne County Emergency Management Office

M. Meisenzahl, Administrator, Monroe County, Office of Emergency Preparedness

T. Judson, Central New York Citizens Awareness Network

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T. Bergman, RI EDO Coordinator S. Richards, NRR (ridsnrrdlpmlpdi)

R. Clark, PM, NRR

P. Milano, PM, NRR (Backup)

C. Welch, SRI - Ginna

M. Evans, DRP W. Cook, DRP R. Junod, DRP

Region I Docket Room (with concurrences)

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U.S. NUCLEAR REGULATORY COMMISSION REGION I

Docket No: 50-244 License No: DPR-18

Report No: 50-244/02-02

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

Facility: R. E. Ginna Nuclear Power Plant

Location: 1503 Lake Road

Ontario, New York 14519

Dates: February 17 through March 30, 2002

Inspectors: C. R. Welch, Senior Resident Inspector

P. R. Frechette, Physical Security Inspector

L. Scholl, Senior Reactor Inspector M. Modes, Senior Reactor Inspector G. Cranston, Reactor Inspector

Approved by: Michele.G. Evans, Chief

Projects Branch 1

Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000244-02-02, 02/17-03/30/2002; Rochester Gas & Electric; R. E. Ginna Nuclear Power Plant. Maintenance Risk, Refueling and Outage, and Other.

The inspection was conducted by resident inspectors and regional specialists in security and In-Service Inspection (ISI). This inspection identified one GREEN issue, which was a Non-Cited Violation. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process (SDP)." Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at: http://www.nrc.gov/reactors/operating/oversight.html.

A. <u>Inspector Identified Findings</u>

Cornerstone: Mitigating Systems

Green. The inspectors identified a Non-Cited Violation (NCV) involving three of five make-up flow paths to the reactor coolant system being isolated and tagged closed contrary to procedure O-2.3.1, "Draining and Operation at Reduced Inventory of the Reactor Coolant System."

The safety significance of this finding was very low because two independent make-up flow paths remained available for the short duration of this condition. (Section 1R20).

B. Licensee Identified Violations

A violation of very low significance which was identified by RG&E was reviewed by the inspectors. Corrective actions taken or planned by RG&E appear reasonable. The violation is listed in section 4OA7 of this report.

Report Details

SUMMARY OF PLANT STATUS

Ginna began the period at full reactor power. Reactor power coast down commenced on February 22, and the unit was brought off line and placed in a cold shutdown condition on March 18, 2002, to begin the scheduled refueling outage.

1. REACTOR SAFETY Initiating Events, Mitigating Systems, and Barrier Integrity [Reactor - R]

R01 Adverse Weather Protection

a. <u>Inspection Scope</u>

The inspectors reviewed RG&E's cold weather protective measures to ensure that systems required for safe operation would remain functional when challenged by adverse weather conditions. Plant areas susceptible to freezing conditions were walked down and verified to have adequate space heating; heat trace circuits were verified energized; the intake structure heaters were verified available; and external ventilation openings were verified secured for the winter as required. Procedure A-54.4.1, "Cold Weather Walkdown," was used as a reference. Corrective actions for ACTION reports 2001-2264 and 2265 were reviewed.

b. <u>Findings</u>

No findings of significance were identified.

R04 Equipment Alignment

a. <u>Inspection Scope</u>

The inspectors performed partial walkdowns of the following system trains while their redundant trains were out of service for maintenance.

- Motor driven auxiliary feedwater train A
- Component cooling water (CCW) train A

The inspectors reviewed alignment of system valves and electrical circuit breakers to ensure proper in-service or standby configurations described in plant procedures and drawings were in effect. During the walkdowns, the inspectors also evaluated material conditions and general housekeeping of the systems and adjacent spaces. ACTION report 2002-0517, regarding operation of the residual heat removal pumps without CCW, was reviewed with engineering personnel and the pump vendor.

b. Findings

No findings of significance were identified.

R05 Fire Protection

a. Inspection Scope

The inspectors observed and/or reviewed the completed test results for the auxiliary building smoke detectors, questioned several assigned fire watches regarding their duties and responsibilities, and conducted tours of the following plant areas to assess the control of combustible materials and ignition sources and the physical condition of installed fire suppression and detection systems.

- Battery rooms A and B
- Auxiliary building intermediate level (west)
- Auxiliary building basement (west)

b. Findings

No findings of significance were identified.

R06 Flood Protection Measures

a. Inspection Scope

To evaluate RG&E's internal flood protection measures, the inspectors toured the auxiliary building, turbine building basement, battery rooms, and emergency diesel generator rooms. During these tours, the inspectors evaluated the physical condition of penetration seals, watertight doors, pump pedestals, curbs, and floor drains. The A emergency diesel generator cable vault was also observed for evidence of standing water.

b. Findings

No findings of significance were identified.

R08 In-Service Inspection Activities

a. <u>Inspection Scope</u>

The inspector verified that RG&E's In-Service Inspection (ISI) Program complied with American Society of Mechanical Engineers Section XI requirements by reviewing the planned nondestructive examination of Steam Generator Nozzle-to-Safe End welds: NSE-1R-I005990, NSE-2R-I006190, PL-FW-IX-ASW-R (I00600U), and PL-FW-IX-ASW-R (I006200) by Cobalt 60 Radiography. The inspector reviewed the licensee's dry-run of the inspection utilizing the on-site Steam Generator lower head mock-up. The inspector reviewed the radiographs taken of the calibration block containing implanted flaws to determine if the planned examination attained the necessary level of sensitivity.

The inspector witnessed the acquisition of Steam Generator Eddy-Current data on tubes R34C36 and R36C36 in Steam Generator Number 2. The inspector witnessed the resolution of indications on Steam Generator Number 2, tubes R13C 29, R9C29,

R77C49, and R40C52. The inspector interviewed the Eddy Current Level III examiner for Ginna and reviewed the aging management program, steam generator management program and inspection planning for the steam generators at Ginna.

An independent NRC contractor reviewed the 1999 Eddy Current inspection of the control rod drive mechanism nozzle tubes. The contractor reviewed the inspection of the four tubes that did not have a thermal sleeve insert, using a rotating pancake coil and the inspection of the remainder of the tubes, containing thermal sleeves, using a blade probe. The contractor reviewed the data for all four tubes interrogated with the pancake coil and reviewed data for the blade inspection on tubes 8, 13 and 15. These tubes were chosen for review because the initial eddy current inspection revealed indications requiring further examination. The area-of-interest of each tube was examined by ultrasonic testing which did not corroborate any indication.

A sample of deficiencies related to the ISI Program were reviewed to verify that the licensee entered the problems into the corrective action program and provided or planned appropriate corrective action.

b. Findings

No findings of significance were identified.

R11 <u>Licensed Operator Requalification</u>

a. Inspection Scope

On February 25, 2002, the inspectors observed and evaluated a simulator exam to assess training effectiveness and the operating crew's performance against established training standards. Areas of assessment included: communications; command and control; procedure usage; the ability to take timely action in a safe direction; and emergency action level identification and notification timeliness. The inspectors reviewed the evaluator's critique and verified that the simulator's board configuration matched that of the actual control room.

b. Findings

No findings of significance were identified.

R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed RG&E's maintenance rule implementation for ACTION report 2001-0433, breaker 52/SIP1C1 amptector set point drift. The review evaluated system scoping, performance criteria/goal monitoring, and problem classification. The inspectors observed the March 7 maintenance rule expert panel meeting and reviewed the justification, approved by the panel, for the transition of service water train SWS02 from maintenance rule status a(1) back to a(2), ACTION report 2001-1757.

b. <u>Findings</u>

No findings of significance were identified.

R13 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

The inspectors evaluated the effectiveness of RG&E's maintenance risk assessments required by paragraph a(4) of 10 CFR 50.65. This inspection included discussions with control room operators, the work control center, and scheduling department personnel regarding the use of RG&E's online risk monitoring software (EOOS) and the defense-in-depth review check sheet contained in IP-OUT-2, "Outage Risk Management." The inspectors reviewed equipment tracking documentation, daily work schedules, and performed plant tours to gain reasonable assurance that actual plant configuration matched the assessed configuration. Additionally, the inspectors verified that RG&E's risk management actions, for both planned and/or emergent work, were consistent with those described in procedures IP-PSH-2, "Integrated Work Schedule Risk Management" and IP-OUT-2. Risk assessments for the following were reviewed.

- Maintenance activities for February 20th, which included the A emergency diesel generator, fire system maintenance, and spent fuel pool cooling surveillance testing.
- Shutdown risk assessments for March 22 and 23 supporting reactor coolant system mid-loop and reduced inventory conditions associated with installation of the steam generator nozzle dams.

b. <u>Findings</u>

In conjunction with the observations documented in Section 1R20, the inspector identified that RG&E did not appropriately assess and manage plant risk while in a reduced reactor coolant inventory condition. Risk management instruction IP-OUT-2, "Outage Risk Management," was not closely followed. Specifically, the guidance of Attachments B and G of IP-OUT-2, pertaining to use of the on-line risk monitor (EOOS) in the shutdown mode, were overlooked. These procedural oversights did not result in a change to the overall plant risk, but were missed opportunities to have prevented the reactor coolant system make-up flow path isolation event. Refer to Section 1R20 for additional inspector observations and findings in this area.

R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed RG&E's operability evaluation for ACTION report 2002-0530, regarding the improper calibration of source range instrument N31(see 4OA7) and the technical equivalency (No. 2000-0037) for Westinghouse's BF-66F relays. The inspection included discussion with plant personnel and reviews of applicable technical specifications and design bases information to determine if system operability or technical equivalency were properly justified.

b. Findings

No findings of significance were identified.

R16 Operator Workarounds

a. <u>Inspection Scope</u>

The inspectors reviewed the cumulative effects of Ginna's existing operator workarounds/challenges, control room deficiencies, and degraded but operable equipment. The inspection focused on the overall impact to plant systems and operator event response capability. Ginna procedure A-52.16, "Operator Workaround/Challenge Control," technical specifications, system design information, and corrective action program records were referenced. The inspectors also looked for potential operator workarounds/challenges not formally evaluated by RG&E.

b. Findings

No findings of significance were identified.

R17 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed the piping modifications for the spent fuel pool cooling system installed under plant change record (PCR) 2001-0036 to assess the PCR's impact on the system's design and licensing bases, performance capability, and plant safety. Inspection activities included a design review (e.g. materials used, seismic qualification, heat removal requirements), an implementation review, to verify installation of the modification did not adversely impact the ability to carry-out plant emergency or abnormal operating procedures or cause the loss of key safety functions, and a testing review, to verify the post maintenance testing adequately established operability.

b. Findings

No findings of significance were identified.

R19 Post Maintenance Testing

a. <u>Inspection Scope</u>

The inspectors reviewed the post maintenance tests for the following work orders (WO) to verify that RG&E appropriately demonstrated the components' ability to perform their intended safety function.

•	WO. 20101032	Replace B CCW pump mechanical seals
•	WO. 20102099	Install N31& N32 low noise pre-amps
•	WO. 20103155	Install spent fuel pool piping modifications

b. <u>Findings</u>

No findings of significance were identified.

R20 Refueling and Outage Activities

a. Inspection Scope

Review of Outage Plan

The inspectors attended several outage planning meetings, met with scheduling personnel, and reviewed the following documents to assess RG&E's consideration of plant risk, industry operating experience, and site specific outage problems:

- Ginna 2002 Refueling Outage Safety Review
- Procedure IP-OUT-1, "Outage Scheduling"
- Procedure IP-OUT-2, "Outage Risk Management"

Monitoring of Shutdown Activities

The inspectors observed the performance of all or portions of the following procedures:

- O-2.1, "Normal Shutdown to Hot Shutdown"
- O-2.2, "Plant Shutdown From Hot Shutdown to Cold Conditions"
- O-2.3, "Draining the Reactor Coolant System to < 84" but > 64""

The inspectors verified the proper establishment of shutdown cooling and observed that technical specifications, such as reactor vessel cooldown limits, were satisfied.

Licensee Control of Outage Activities

The inspectors conducted frequent plant tours and control room walkdowns to observe RG&E's control of various outage activities. This inspection included: reviews of plant configuration management controls, such as equipment tagouts; observations of control room instrumentation used to monitor reactor plant parameters; and frequent operational verifications of the residual heat removal system, spent fuel pool cooling system, source range nuclear instruments, and required electrical power supplies.

Reduced Inventory and Mid-Loop Conditions

The inspectors reviewed RG&E's commitments to Generic Letter (GL) 88-17, Reduced Inventory Operations and reviewed and/or observed the performance of portions of the following procedures:

- O-2.3.1, "Draining and Operation at Reduced Inventory of the Reactor Coolant System,"
- O-2.3.1A, "Containment Closure Capability in Two Hours During RCS Reduced Inventory Operation"

Prior to and during the reduced inventory condition, the inspectors reviewed RG&E's commitments to Generic Letter 88-17 against the established system configurations.

Refueling Activities

The inspectors witnessed performance of portions of the refueling activities associated with reactor disassembly and fuel movements from the control room, spent fuel pool, and refueling platform in containment. The inspectors also verified that RG&E satisfied technical specifications associated with refueling operations.

b. Findings

Green. The inspectors identified three of five reactor coolant make-up flow paths had been isolated and tagged closed contrary to the requirements of O-2.3.1, "Draining and Operation at Reduced Inventory of the Reactor Coolant System."

On March 23, the inspectors identified the flow paths from the charging system and one of two safety injection pumps had been isolated and tagged closed contrary to procedure O-2.3.1, "Draining and Operation at Reduced Inventory of the Reactor Coolant System." The reactor coolant system was in a reduced inventory condition (i.e. reactor vessel level had been lowered) at the time the inspector made this observation. Procedure O-2.3.1 requires a minimum of three independent means of RCS inventory make-up be available. Specifically, the procedure requires a gravity fill path, and a minimum of one charging train and one safety injection train. These requirements are based upon Updated Final Safety Analysis Report, Section 5.4.5.4.4, and the licensee response to NRC Generic Letter 88-17, Reduced Inventory Operation.

The inspector determined that prior to entering the reduced inventory condition, five methods were established per Attachment F of O-2.3.1; a gravity fill path from the refueling water storage tank, two charging trains, and two safety injection trains. Further, IP-OUT-2, Section 3.5.4, prohibits configuration changes to specific systems while in a reduced inventory condition, unless the changes are required to support the reason for the reduced inventory condition. Procedure IP-OUT-2 also requires that the injection paths to the RCS be maintained operable.

This finding had a credible impact on safety and adversely impacted accident mitigation systems. The risk significance of the issue was evaluated using MC 0609, Appendix G, Table 1, and was determined to be of very low safety significance, based upon one high pressure pump train and one other pump available for vessel inventory makeup (the inspectors determined that the RWST gravity feed makeup source was equivalent to a

pump makeup source). An SDP phase II risk assessment was performed which took into account: 1) the ability to gravity fill and/or inject using one train of safety injection; 2) operator action to restore the isolated flow paths; 3) design analysis NSL-0000-004, (Rev. 0), dated March 6, 1989, which concluded that calculated back pressure in the RCS on March 23 would not have prevented gravity fill; and, 4) an approximate two hour time of exposure. Since two sources of reactor vessel inventory makeup were always available, this finding screened as very low risk significance (Green).

Isolation of three of five make-up flow paths violated the requirements of station procedures O-2.3.1, IP-OUT-2, and Technical Specifications 5.4.1. However, because of the very low safety significance of this violation and because RG&E has entered the issue into their corrective action program (ACTION report 2002-0613), this violation is being treated as Non-Cited Violation, in accordance with Section VI.A.1 of the NRC's Enforcement Policy. (NCV 50-244/02-02-01)

R22 Surveillance Testing

a. <u>Inspection Scope</u>

The inspectors witnessed the performance and/or reviewed test data for the following activities to verify that the tests demonstrate the associated system's functional capability and operational readiness.

- PT-2.2Q, "Residual Heat Removal System Quarterly."
- PTT-23.20, "Containment Isolation Valve Leak Rate Testing RCDT Gas Header Pen 129."
- CPI-LVL-432A, "Calibration of Reactor Coolant Loop A Level Loop 432A Rack Instrumentation."
- CPI-LVL-432B, "Calibration of Reactor Coolant Loop B Level Loop 432B Rack Instrumentation."
- CPI-LIT-432A, "Calibration of Reactor Coolant Loop A Level Transmitter."
- CPI-LIT-432B, "Calibration of Reactor Coolant Loop B Level Transmitter."

b. <u>Findings</u>

No findings of significance were identified.

3. SAFEGUARDS

Physical Protection [PP]

PP1 Access Authorization Program

a. <u>Inspection Scope</u>

The following activities were conducted to determine the effectiveness of RG&E's behavior observation portion of the personnel screening and fitness-for-duty programs as measured against the requirements of 10 CFR 26.22 and the licensee's Fitness for Duty Program documents.

Five supervisors representing the Maintenance, Radiation Protection, Safety, Quality Assurance and Training departments were interviewed, on March 13, 2002, regarding their understanding of behavior observation responsibilities and the ability to recognize aberrant behavior traits. Two Access Authorization/Fitness-for-Duty self-assessments, two semi-annual Fitness for Duty performance data reports, an audit, event reports and loggable events for the four previous quarters were reviewed, during March 12-13, 2002. On March 13, 2002, five individuals who perform escort duties were interviewed to establish their knowledge level of those duties. Behavior observation training procedures and records were reviewed on March 12, 2002.

b. Findings

No findings of significance were identified.

PP2 Access Control

a. Inspection Scope

The following activities were conducted during the inspection period to verify that the licensee has effective site access controls, and equipment in place designed to detect and prevent the introduction of contraband (firearms, explosives, incendiary devices) into the protected area as measured against 10 CFR 73.55(d) and the Physical Security Plan and Procedures.

Site access control activities were observed, including personnel and package processing through the search equipment during peak ingress periods on March 11 and 12, 2002. Two vehicle searches were observed on March 12, 2002. On March 12, 2002, testing of all access control equipment; including metal detectors, explosive material detectors, and X-ray examination equipment, was observed. The Access Control event log, staffing rosters, an audit, and three maintenance work requests were also reviewed.

b. <u>Findings</u>

No findings of significance were identified.

4. OTHER ACTIVITIES [OA]

OA1 Performance Indicator Verification

a. <u>Inspection Scope</u>

The inspectors reviewed the residual heat removal (RHR) safety system unavailability (SSU) performance indicator (PI) data for the third and fourth quarters of 2001 to verify the completeness and accuracy of the submitted data. The inspection consisted of discussions with RG&E personnel and a review of unavailability records, including operator logs, ACTION reports, work orders, and surveillance procedures for the period in question. The inspectors verified that system unavailability which had been unaccounted for (AR 2002-0492) did not cause a threshold change in the RHR SSU PI. RG&E planned to submit corrected data in the next quarterly submittal.

The inspector reviewed RG&E's programs for gathering and submitting data for the Fitness-for-Duty, Personnel Screening, and Protected Area Security Equipment Performance Indicators. The review included tracking and trending reports, personnel interviews and security event reports for the Performance Indicator data collected from the 1st quarter of 2001 through the 4th quarter of 2001.

b. Findings

No findings of significance were identified.

OA3 Event Follow-up

a. Inspection Scope

The inspectors reviewed Safeguards Licensee Event Report (LER) 05000244/2001-S01-00, regarding the presence of an unattended security weapon in the mens room on December 24, 2001. This LER is captured in RG&E's corrective action program (ACTION report 2001-2245) and is closed.

b. <u>Findings</u>

No findings of significance were identified.

OA5 Other

TI 2515/145 - Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles

a. Inspection Scope

In letters to the NRC dated September 4, 2001 and December 31, 2001, Rochester Gas and Electric (RG&E) provided responses to Bulletin 2001-001 and the bases for conducting no inspections during the March 2002 outage. The NRC reviewed and found the licensee's response to Bulletin 2001-001 to be acceptable. This was documented in an NRC letter to RG&E, dated February 25, 2002.

The NRC inspector reviewed some of the 1999 Eddy current data, which formed part of RG&E's basis in the Bulletin 2001-001 response. Also, the inspector reviewed the licensee's activities in response to significant head degradation identified at another plant. While the activities were not directly related to Bulletin 2001-001, some of these activities are documented in Attachment 2.

b. Findings

No findings of significance were identified.

OA6 Meetings

a. Exit Meeting Summary

On April 2, 2002, the inspectors presented their overall findings to members of RG&E management led by Mr. Joseph Widay. RG&E management acknowledged the findings presented. No proprietary information was identified.

OA7 <u>Licensee Identified Violations</u>: The following finding of very low significance was identified by the licensee and is a violation of NRC requirements which meets the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as a Non-Cited Violation (NCV).

NCV Tracking Number Requirement License Failed to Meet

NCV 50-244/02-02-02

Technical Specification 5.4.1.a requires that written procedures be established, implemented and maintained for activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. On January 18, 2002, source range nuclear instrumentation channel N-31 was improperly calibrated when the technicians failed to properly implement procedure CPI-SR-N31, "Calibration of Source Range N31." Reference Action Report 2002-0530. This is being treated as a Non-Cited Violation.

Attachment 1

Supplemental Information

a. Key Points of Contact

RG&E

P. Bamford Primary Systems and Reactor Engineering Manager

R. Biedenbach Safety/Fire Coordinator

A. Butcavage System Engineer

S. Eckert Nuclear Access Authorization Administrator

M. Flaherty Nuclear Safety & Licensing Manager

B. Flynn Scheduling Manager

T. Harding Licensing
F. Klepacki ISI Engineer

P. Lewis Manager PICS (NDE)
M. Lilley Quality Assurance Manager

R. Marchionda Nuclear Assessment Department Manager

R. Mecredy VP Nuclear Operations

R. Ploof Balance of Plant Systems Engineering Manager

P. Polfleit Corporate Emergency Planner
R. Popp Production Superintendent
M. Shields Eddy Current Level III
J. Smith Maintenance Superintendent

J. Smith Maintenance Superintendent R. Teed Nuclear Security Supervisor

R. Watts Nuclear Training Department Manager
J. Wayland I&C/Electrical Maintenance Manager

J. Widay VP, Plant Manager T. White Operations Manager

G. Wrobel Nuclear Safety & Licensing Manager

b. List of Items Opened, Closed, and Discussed

Opened

None

Opened/Closed

NCV 50-244/02-02-01: On March 23, 2002, make-up flow paths to the reactor

coolant system were isolated in violation of the

requirements of station procedures O-2.3.1 and IP-OUT-2 constituting a violation of Technical Specifications section

5.4, "Procedures."

NCV 50-244/02-02-02: On January 18, 2002, the improper calibration of source

range nuclear instrumentation channel N-31 occurred when the technicians failed to properly implement procedure CPI-SR-N31, "Calibration of Source Range

N31." Technical specification 5.4.1.a requires that written procedures be established, implemented and maintained for activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Closed

LER 50-244/2001-S01-00,

Safeguards Licensee Event Report regarding the presence of an unattended security weapon in the mens room on December 24, 2001.

c. List of Documents Reviewed

Steam Generator Degradation Assessment 2002 Outage DA-ME-2001-020, Rev. 0 RG&E Review of ET Examination of Reactor Vessel Head Penetration Using a Blade Probe 54-ISI-490-03

CRDM Nozzle Calibration Standard Dwg. No. 12275003, Rev. 3

RG&E Review of ET Examination of Reactor Vessel Head Ventline Nozzles using MRPC 54-ISI-492-00

Framatome - Technical Procedures for the Multifrequency Eddy Current Examination of Ventline Nozzles 54-ISI-492-00

Demonstrations of Inspection Technology for Alloy 600 CRDM Head Penetrations EPRI TR-106260, Oct. 96

AR 2000-1399 "Missed RT Examination of AFW Piping by Valve 4013" (10 Welds)

AR 2000-1652 "INPO SEN 216, 'Leakage from Reactor Vessel Nozzle to Hot Leg Weld"

AR 2000-1192 "No ISI Examination Performed on Snubber FWU-17 Prior to Removal" AR 2000-1227 "Worker Did Not Sign Out on Confined Space Permit"

AR 2000-0193 "Annual Calibration of Serial Number Eddy Current Instrument Found Out of Tolerance"

AR 2000-0873 "Purchase Requisitions for Nuclear Related Services Created which By-Pass SED QA Review"

AINT-2001-008-DHK, Physical Security Program Audit, August 17, 2001

Rochester Gas and Electric Fitness for Duty Training Requirements, January 17, 2001 Fitness for Duty Performance Data Report, July - December, 2001

Fitness for Duty Performance Data Report, January - June, 2001

PT-13.11, Gamewell Zone Smoke Detector Testing Zones ZO1 (Aux. Base. East)

PT-13.11.20. Gamewell Zone Smoke Detector Testing Zones ZO3 (Aux. Inter.)

PT-13.11.21, Gamewell Zone Smoke Detector Testing Zones ZO4 (Aux. Upper)

PT-13.11.19, Gamewell Zone Smoke Detector Testing Zones ZO2D1(RHR PIT) ZO2D2 (Aux. Base. West)

d. <u>List of Acronyms Used</u>

CCW Component Cooling Water

DBT Design Basis Threat GL Generic Letter

IMC Inspection Manual Chapter

ISI In-Service Inspection MC Manual Chapter NCV Non-cited Violation

NRC Nuclear Regulatory Commission

PCR Plant Change Record Pl Performance Indicator

RG&E Rochester Gas and Electric Corporation

RHR Residual Heat Removal

SDP Significance Determination Process

SSU Safety System Unavailability

UFSAR Updated Final Safety Analysis Report

Attachment 2

TI 2515/145 - Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles Reporting Requirements

a. During this outage, the licensee did not perform specific inspections in response to Bulletin 2001-001. However, the licensee performed a surface Eddy Current examination of accessible inside surfaces of the control rod drive mechanism nozzles during their 1999 refueling outage. During the 1999 outage, the licensee performed confirmatory ultrasonic examination on indications within three tubes and determined the indications did not have enough depth to constitute cracking.

During the current refueling outage, the licensee performed a remote visual examination of the control rod drive mechanisms and instrument penetrations from above the head, looking at the condition of the insulation on the head and looking at areas above the insulation. The licensee also performed an A-Scan ultrasonic interrogation of the vessel head around a single drive penetration at the center of the vessel head. The examination was performed from below the head. The licensee performed the same examination from above the head outside the shroud flange, on the bare metal of the head, to interrogate the area adjacent to the four outermost penetrations. The ultrasonic examinations were performed to determine the presence of any voids in the head in these areas.

- b. The reactor vessel head is insulated with insulation blocks covered by a coating. Overall, the insulation was in good shape with most of the covering surface containing some cracking. There were deep fissures in the insulation, some of which are deep and wide enough to see the reactor vessel head. There are areas where small pieces of the material covering the insulation blocks are missing. Pictures, taken of the reactor head during construction, show similar views of missing coating. There are areas where the insulation has been damaged enough that the reactor vessel head is exposed. Between control rod drive mechanism nozzles 30 and 10 there was an insulation block missing. The block had fallen down the head and was resting against the ventilation shroud. There were no signs of any boric acid.
- c., d. & e. During this outage, the licensee did not perform specific inspection in response to Bulletin 2001-001. Therefore, these reporting requirements specified in Bulletin 2001-001 are not applicable.