

# Ginna

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## Initiating Events

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## Mitigating Systems

**Significance:**  May 18, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to formally control and evaluate a compensatory fire protection measure installed to provide a temporary water supply to the containment fire hose reels.**

Contrary to the requirements of Technical Specification 5.4.1.d, which required written procedures be established, implemented and maintained covering the Fire Protection Program; RG&E did not evaluate and implement a compensatory measure using an approved procedure, e.g. procedure IP-DES-3, "Temporary Modifications." The finding was determined to be of very low safety significance (Green) because at the time this condition existed, the plant was shutdown and none of the safe shutdown equipment in containment was necessary to support shutdown cooling operations.

Inspection Report# : [2002003\(pdf\)](#)

**Significance:**  Mar 23, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**INADVERTENT ISOLATION OF THREE OF FIVE REACTPOR COOLANT MAKE-UP PATHS.**

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."

Inspection Report# : [2002002\(pdf\)](#)

**Significance:**  Jan 18, 2002

Identified By: Licensee

Item Type: NCV NonCited Violation

**SOURCE RANGE DETECTOR N-31IMPROPERLY CALIBRATED**

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.

Inspection Report# : [2002002\(pdf\)](#)

**Significance:** N/A Nov 10, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**10CFR50, Appendix B, Criterion V, RG&E failed to provide appropriate instructions for the re-lug of all four service water pump motor leads following motor replacement**

10CFR50, Appendix B, Criterion V, Instructions, Procedures, and Drawings requires in part, activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, and drawings. The replacement of the service water pump motors in 1996 -1997 time frame was not accomplished using procedures with appropriate instructions.

Inspection Report# : [2001009\(pdf\)](#)

**Significance:**  Sep 29, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Green. RG&E did not include appropriate instructions and acceptance criteria for the aquisition, installation, and testing of EDG fuel oil booster pumps.**

Green. RG&E did not include appropriate instructions and acceptance criteria in applicable station documents for the aquisition, installation, and vendor testing of the emergency diesel generator (EDG) fuel oil booster pumps. As a result, incorrectly assembled pumps experienced shaft seal failures when their associated EDGs were placed in service. This finding was determined to be a Non-Cited Violation of 10 CFR 50 Appendix B, Criterion V, "Instructions, Procedures and Drawings." This issue had an actual impact on safety because both EDGs experienced unplanned unavailability due to the common cause failure of the fuel oil booster pump shaft seals.

Inspection Report# : [2001008\(pdf\)](#)

**Significance:**  Jun 08, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Lack of procedural guidance for a loss of service water event.**

Green. The team determined there was no procedure to address a loss of service water (LOSW) event with offsite power available. The finding related to two LOSW transient scenarios concerning the turbine drive auxiliary feedwater (TDAFW) pump and the standby auxiliary feedwater (SAFW) pumps and the need to maintain the secondary heat removal function and prevent core damage. Neither the control room annunciator response procedures nor applicable emergency operating procedures, contained entry or transition criteria to direct the operators, following a LOSW transient, to conduct existing procedures to align temporary fire water cooling to the TDAFW pump or to align the alternate city water suction supply to the SFW pumps. This issue was of more than minor concern because the Ginna Phase 2 SDP worksheet assumed that following a LOSW transient the failure of operators to take the appropriate action for TDAFW and SAFW pumps would lead to core damage. A subsequent Phase 3 SDP analysis showed that the lack of specific entry or transition criteria in procedures were of very low safety significance (Green); because operators could reasonably have been expected to maintain the secondary heat removal function. Specifically, in the sequence which required the alignment of temporary cooling water to the TDAFW pump, the pump could reasonably be expected to operate, without cooling water, for longer than the licensing basis of two hours and longer than the approximately 3.5 hours required for the condensate storage tank to reach a water level of five feet, allowing a proceduralized transfer to the SAFW pumps with the alternate city water supply. In the sequence that included the failure of the TDAFW pump to start or to run; given the frequency of the pump failure and allowing for recovery actions to restore the service water system, the operators trained in the alignment of the SAFW pumps to city water would reasonably have been effective. (Section 1R21.b, Loss of Service Water)

Inspection Report# : [2001005\(pdf\)](#)

**Significance:**  Feb 10, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to take appropriate corrective actions for an inoperable service water flow instrument.**

The inspectors identified a non-cited violation involving the failure to take appropriate corrective actions for an inoperable service water flow instrument. Without appropriate operational guidance for this condition, operators would not have been able to verify the service water flows to the component cooling water heat exchangers specified in emergency operating procedures. This finding is of very low safety significance because the inoperable flow instrument did not result in a loss of safety function in the affected systems.

Inspection Report# : [2000011\(pdf\)](#)



**Significance:** Dec 30, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to adequately establish a continuous fire watch.**

The inspectors identified a non-cited violation involving the failure to properly implement fire protection program procedures. RG&E did not adequately station a continuous fire watch for an inoperable automatic fire suppression system. This finding was of very low safety significance because the inadequate compensatory fire watch existed for a short duration, the installed fire detection systems were operable, and the station's fire brigade effectiveness was not degraded.

Inspection Report# : [2000010\(pdf\)](#)



**Significance:** Nov 11, 2000

Identified By: Licensee

Item Type: NCV NonCited Violation

**Both source range nuclear instruments inoperable.**

On Sept 21, in Mode 5, operations management identified that the one presumed operable source range nuclear instrument (N-32), was also inoperable for approximately 14 hours, and unrecognized by the control room staff.

Inspection Report# : [2000008\(pdf\)](#)



**Significance:** Nov 11, 2000

Identified By: Licensee

Item Type: NCV NonCited Violation

**Two of four containment recirculation fan coolers inoperable during plant mode change.**

On October 14, during plant heat-up, control room operators discovered that two of four containment recirculation fan coolers were inoperable, due to their main control switched being in the pull-stop position.

Inspection Report# : [2000008\(pdf\)](#)



**Significance:** Aug 12, 2000

Identified By: NRC

Item Type: FIN Finding

**Less than thorough evaluation of temporary modification.**

GREEN. The inspectors identified that RG&E did not thoroughly consider the risk associated with the implementation of a temporary modification to the refueling water storage tank (RWST) purification system. Installation of the modification increased the probability of internal flooding and RWST loss of inventory events. RG&E subsequently determined that the overall increases in core damage frequency for these events were minimal. (Section 1R23)

Inspection Report# : [2000005\(pdf\)](#)

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## Barrier Integrity

**Significance:**  Nov 02, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Green. A Non-Cited Violation of 10CFR50 Appendix B, Criterion XVI, Corrective Action, for failure to identify that the support for a containment isolation valve did not meet seismic qualification.**

Green. A Non-Cited Violation of 10CFR50 Appendix B, Criterion XVI, Corrective Action, for failure to identify that the support for containment isolation valve AOV-966C did not meet the screening criteria for seismic qualification, and therefore was not properly evaluated. The license declared the penetration inoperable and closed the redundant containment isolation valve pending resolution of the problem. This finding was of very low safety significance because, (1) the probability of a design basis earthquake is very low, (2) the existing valve supports, though they did not meet the seismic qualification screening criteria, would provide some support to mitigate the consequences of a seismic event, (3) although not leak tested, there are other normally closed valves located in the line upstream of AOV-966C, and (4) a manual containment isolation valve is located upstream of AOV-966C. Also, there was no actual open pathway in reactor containment, therefore the SDP Phase 1 screens to Green. Because the finding is of very low safety significance and the finding was captured in the licensee's corrective action program, this finding is being treated as a Non-Cited Violation, consistent with Section VI.A.1 of the NRC Enforcement Policy.

Inspection Report# : [2001010\(pdf\)](#)

**Significance:** N/A Sep 29, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**Failure to perform technical specification surveillance requirement 3.6.3.2 for the main steam isolation bypass valves.**

Technical specifications surveillance requirement 3.6.3.2 requires, in part, that containment isolation boundaries that are located outside containment and not locked, sealed, or otherwise secured are verified to be in their required position every 92 days. On September 4, 2001, RG&E identified that this surveillance was not being performed as required for the main steam isolation bypass valves. This issue was entered into the corrective action program (ACTION report No. 2001-1588) and is being treated as a Non-Cited Violation.

Inspection Report# : [2001008\(pdf\)](#)

**Significance:**  Jul 01, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to properly translate system design information into surveillance testing procedures.**

GREEN. The inspectors identified that RG&E did not properly translate emergency core cooling system (ECCS) design information into a procedure used for determining ECCS leakage outside containment. The procedure did not contain instructions for increasing leakage rates measured at low system pressure to those rates expected at the higher system pressures during the recirculation phase following a loss of coolant accident. Actual measured leakage rates were determined to be far below technical specification limits. This finding is a non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control." (Section 1R22)

Inspection Report# : [2000003\(pdf\)](#)

## Emergency Preparedness

**Significance:** TBD Jun 29, 2002

Identified By: NRC

Item Type: AV Apparent Violation

**Failure to correct problems with the ANS siren feedback system which resulted in a loss of ANS function per 10 CFR 50.47(b)(5).**

The inspectors identified, that should emergency planning zone (EPZ) siren failures occur, the ability to notify the public in a timely manner, within the 10 mile EPZ, was compromised. The finding was evaluated using Inspection Manual Chapter (IMC) 0609, Appendix B, "Emergency Preparedness Significance Determination Process."

Preliminarily, this finding has been determined to be of low to moderate safety significance (White) and an apparent violation of regulatory requirement 10 CFR 50.47(b)(5), which requires in part that licensees establish a means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ.

Inspection Report# : [2002004\(pdf\)](#)

G

**Significance:** G Apr 17, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to utilize mobile loudspeakers for notification of the transient population.**

A non-cited violation of 10 CFR 50.54(q) and E-Plan Section 6.3.13 was identified, regarding the utilization of mobile loudspeakers to alert the transient population of an emergency. The licensee did not possess this equipment and was not ensuring that this notification function was being met. The finding was of very low safety significance (Green) due to the fact that the sirens alone provided designed coverage for notification of the public in the ten-mile Emergency Planning Zone.

Inspection Report# : [2002009\(pdf\)](#)

**Significance:** TBD Apr 17, 2002

Identified By: NRC

Item Type: URI Unresolved item

**Licensee E-Plan staffing commitments were inconsistent with those prescribed in NUREG-0654, which was a potential failure to meet planning standard 10 CFR 50.47(b)(2).**

Licensee E-Plan staffing requirements were inconsistent with those prescribed in NUREG-0654, a licensing standard used by the NRC staff in order to evaluate a plan meeting planning standard 10 CFR 50.47(b)(2). This planning standard states, in part, that adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, and timely augmentation of response capabilities is available. This issue is unresolved pending the referral to NRC headquarters for further review of licensee staffing requirements, certain changes to those requirements since initial NRC approval, and a determination by NRC that those requirements are adequate for emergency response.

Inspection Report# : [2002009\(pdf\)](#)

G

**Significance:** G Apr 17, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to correct long standing equipment and human performance issues which affect ANS reliability.**

A non-cited violation of 10 CFR 50.54(q) and E-Plan Section 6.3.13 was identified, concerning the reliability of the Alert Notification System to fulfill its notification function within design objectives. Long standing equipment and human performance issues that affect ANS reliability have not been corrected, affecting the licensee's ability to fulfill

the public notification function. This finding was of very low safety significance (Green) based on the fact that the siren feedback system alerted the licensee to siren malfunctions, permitting the use of compensatory measures (i.e., route alerting), if necessary.

Inspection Report# : [2002009\(pdf\)](#)

**Significance:** N/A Sep 29, 2000

Identified By: NRC

Item Type: FIN Finding

**Supplemental inspection for WHITE performance indicator**

The NRC performed a supplemental inspection, using inspection procedure 95001, to assess RG&E's evaluation associated with a white performance indicator for alert and notification system reliability. The inspector determined that RG&E performed a thorough evaluation for the performance indicator's change in color. This change was primarily due to a silent test failure that occurred on June 26, 2000. RG&E determined the cause of the silent test failure was the temporary interruption in the telephone communication line which serves to activate and transmit test signals to the Wayne County sirens. The inspector concluded that RG&E developed comprehensive corrective actions for this performance issue.

Inspection Report# : [2000007\(pdf\)](#)

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## Occupational Radiation Safety

**Significance:** N/A May 18, 2002

Identified By: Licensee

Item Type: NCV NonCited Violation

**Licensee Identified Violations**

Technical Specification 5.7.2 requires that areas with radiation levels >1000 mrem/hr at a distance of 30 cm be locked or be continuously guarded to prevent unauthorized entry. Contrary to this requirement, the entrance to the Reactor Cavity, a Technical Specification Locked High Radiation Area, was left unlocked and unguarded for a period of about twelve (12) hours. RG&E concluded that no entry was made into this area during the time it was unlocked. Reference ACTION report 02-0358.

Inspection Report# : [2002003\(pdf\)](#)

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## Public Radiation Safety

**Significance:** N/A Jun 30, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**Failure to perform the required radioactive gaseous effluent vent flow rate determination every 18 months in accordance with Section 5.5.4 of the ITS and Table 3.2-2 of the ODCM.**

Section 5.5.4 of the Improved Technical Specifications and Table 3.2-2 of the Offsite Dose Calculation Manual require that the radioactive gaseous effluent vent flow rate determination be performed every 18 months. RG&E did not perform flow rate determinations for the plant and the containment vents as specified in the ODCM. RG&E documented the corrective actions in Action Report No. 2000-1630. This is being treated as a NCV.

Inspection Report# : [2001006\(pdf\)](#)

**Significance:**  Jul 01, 2000

Identified By: Licensee

Item Type: NCV NonCited Violation

**Failure to properly sample a gas decay tank prior to release.**

GREEN. During a gas decay tank release evolution, operators mistakenly released the wrong tank. The resultant radioactive release was well below regulatory limits. Nevertheless, the inspectors determined this issue to be a non-cited violation of technical specification 5.4.1, "Procedures," because RG&E did not sample the noted tank within twelve hours of releasing it, as required by station radioactive effluent control program procedures. (Section 2PS1)

Inspection Report# : [2000003\(pdf\)](#)

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## Physical Protection

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## Miscellaneous

**Significance:** N/A Nov 02, 2001

Identified By: NRC

Item Type: FIN Finding

**71152 Identification and Resolution of Problems Summary**

The team determined that the licensee's performance in the area of problem identification and resolution at the Ginna site was adequate. Based on a review of items from the licensee's operating, maintenance, engineering, and quality assurance processes, the team concluded the licensee was identifying problems and entering them into their corrective action program at the proper threshold. Notwithstanding, the team identified an example of a failure to promptly identify and subsequently correct problems associated with a primary containment isolation valve. The team also determined that the licensee was evaluating and categorizing problems at the correct significance level. Identified problems were properly prioritized. The evaluations were normally of adequate depth to identify the causes of problems and appropriately broad in considering the extent of the condition. The licensee developed and implemented corrective actions that appeared reasonable to address the identified problems. The team determined that, in general, the corrective actions were completed or scheduled to be completed in a timely manner.

Inspection Report# : [2001010\(pdf\)](#)

**Significance:**  Nov 17, 2000

Identified By: Licensee

Item Type: NCV NonCited Violation

**Failure to ensure that the alternate shutdown capability for the screen house was electrically and physically independent of the area.**

The failure to isolate all potentially affected cables within the screen house constitutes a violation of the requirements of 10 CFR 50, Appendix R, Section III.G.3. (reference LER 05000244/2000-002)

Inspection Report# : [2000009\(pdf\)](#)

**Significance:** N/A Nov 11, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Violation of 10 CFR 50.59**

Inadequate safety evaluation for main steam non-return check valves. (Closes EEI 05000244/1999-005-01.)

Inspection Report# : [2000008\(pdf\)](#)

**Significance:** N/A Aug 11, 2000

Identified By: NRC

Item Type: FIN Finding

**Annual Problem Identification and Resolution inspection**

The Ginna Nuclear Power Plant had an acceptable problem identification and resolution process. The multi-tier problem identification system was adequately integrated and the threshold for reporting equipment and personnel performance issues was low. Assigned priorities for problem assessment and identification of required corrective actions were acceptable; operability and reportability evaluations were reasonable. Root cause analyses were also reasonable with occasional weaknesses in the evaluation of and reporting of human performance. Corrective actions were commensurate with the safety significance of the issue and timely. Work environment was safety conscious with plant personnel showing no reluctance in reporting plant issues.

Inspection Report# : [2000004\(pdf\)](#)

**Significance:** N/A Jul 01, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to promptly identify and correct leaking containment tendons grease fill piping.**

NO COLOR. RG&E did not promptly enter problems into their corrective action program for two equipment issues. First, station personnel had noted containment tendon grease leakage since at least September 1999; however, the impact on plant equipment and the development of long-term corrective actions were overlooked until an Action Report was written in June 2000. In the second example, RG&E personnel did not promptly initiate an Action Report for emergency siren test failures. As a result, RG&E failed to complete an NRC notification in a timely manner. These findings are a non-cited violation of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions." (Section 40A2)

Inspection Report# : [2000003\(pdf\)](#)

**Significance:** N/A Jul 01, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to perform 10 CFR 50.59 safety evaluation.**

NO COLOR. RG&E did not perform safety evaluations as required by 10 CFR 50.59 and Ginna's associated implementing procedure (IP-SEV-1). Four examples were identified and determined not to be unreviewed safety questions. The examples indicated improper procedure implementation during the safety review process. This issue was determined to be a non-cited violation of 10 CFR 50.59. (Section 40A4.2)

Inspection Report# : [2000003\(pdf\)](#)

Last modified : August 29, 2002