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SUBJECT: RESPONDS TO 790208 REQUEST & FORWARDS ADDL INFO RE REVISION
 4 TO SUPPL 4 OF FULL-TERM LICENSE APPLICATION.

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March 9, 1979

Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Ziemann:

Enclosed, as requested, is a copy of the additional information regarding Revision 4 to Supplement IV of the Full-Term License Application for the R. E. Ginna Nuclear Power Plant requested by your letter of February 8, 1979.

As indicated in the enclosure, supplement IV will be further revised in the near future to reflect information submitted with this letter.

Sincerely,

Leon D. White, Jr.
Leon D. White, Jr.

CRA:dmaO
Enclosure

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5/11

Enclosure

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

GINNA NUCLEAR POWER PLANT

NRC Comment 1

One of the purposes of Revision 4 of Supplement IV to the Technical Supplement Accompanying Application for a Full-Term Operating License is to endorse the "current NRC Regulatory Guides associated with quality assurance ANSI Standards." The list of guides beginning on page IV-3 of Revision 4 should be revised as noted below to accomplish this purpose.

<u>Document</u>	<u>Revision Shown</u>	<u>Revision Should Be</u>
Regulatory Guide 1.30	None	Rev. 0
Regulatory Guide 1.33	None	Rev. 2
Regulatory Guide 1.37	None	Rev. 0
Regulatory Guide 1.38	None	Rev. 2
Regulatory Guide 1.39	None	Rev. 2
Regulatory Guide 1.58	None	Rev. 0
Regulatory Guide 1.64	None	Rev. 2
Regulatory Guide 1.74	None	Rev. 0
Regulatory Guide 1.88	None	Rev. 2
Regulatory Guide 1.94	(Not Listed)	Rev. 1
Regulatory Guide 1.116	None	Rev. 0-R
Regulatory Guide 1.123	None	Rev. 1
ANSI N45.2.12	None	D3, R4, 2/74

RG&E Clarification 1

It was not intended, as inferred in the statement of purposes, to provide an endorsement of all the "current NRC Regulatory Guides associated with quality assurance ANSI Standards." Since the endorsement of a portion of the listing was intended, clarification will be made in the statement of stated purposes through deletion of the term "current". In addition, consistent with your current practice pages IV-3 and IV-4 are being revised to reflect the revision levels of the NRC Regulatory Guides and ANSI Standards to which the program conforms.

NRC Comment 2

Revision 4 deleted the position of Quality Assurance Engineer, QA Program. Please show who has the responsibility formerly assigned to this position.

RG&E Clarification 2

This position never did evolve into a full time posi-

tion as originally perceived. The duties, primarily administrative in nature, are assigned on a rotational basis to QA Group non key staff personnel. This part time function has been retitled within the QA Group procedures as QA Group Administrator with duties performed intermittently to ensure schedules, reports and revised procedures are issued when necessary. Group training, a duty formerly assigned to the deleted position, is assumed by the Manager, Quality Assurance. The description of the Quality Assurance Manager on page IV-6 will be revised to provide this clarification.

NRC Comment 3

Revision 4 deleted the responsibilities of the Superintendent, General Maintenance to train personnel who support his activities and for administrative direction of nondestructive examination personnel. Please show who has these responsibilities.

RG&E Clarification 3

Training of General Maintenance personnel for Ginna Station Support activities is coordinated by the General Maintenance Quality Control Coordinator as described on page IV-8 and by the Welding and NDE Engineer as described on page IV-6. Page IV-2 also describes training responsibilities for which each department is responsible. Although the administrative direction for nondestructive examination personnel has not changed, this alignment to General Maintenance is under review. Realignment, if and when it occurs, would involve the consolidation of administrative and functional responsibility under the Welding and Nondestructive Examination Engineer. The description of responsibilities will be revised to further clarify that functional guidance and direction is also provided, when necessary, during the conduct of examinations for those methods for which the Welding and Nondestructive Engineer is a qualified Level III. In addition, the responsibilities of the General Maintenance Quality Control Coordinator described on page IV-8, include coordinating the performance of verification activities (nondestructive examination included) for General Maintenance activities. The clarified descriptions and related organization charts is considered detail sufficient to "provide organization charts and functional responsibility descriptions that denote the line of responsibility and areas of authority within each of the major organizations in a project."

NRC Comment 4

The third paragraph on page IV-10 of Revision 4 has added "Significant" in front of "errors and deficiencies". Describe the controls which assure that errors and deficiencies which are not significant are corrected.

RG&E Clarification 4

A field change system and design verification are the routine methods utilized to correct non significant errors and deficiencies. Page IV-9 describes control of design changes, including field changes in addition to design verification. Clarification of the methods for correcting the non significant errors and deficiencies will be provided in revised page IV-10.

NRC Comment 5

Revision 4 does not indicate that the Manager, Quality Assurance reviews and approves deviations from quality standards as was indicated in Revision 3. Please show who has these responsibilities.

RG&E Clarification 5

The Manager of Quality Assurance retains the responsibility for review and approving deviations from quality standards. The deletion from Revision 4 was inadvertent and will be rectified in revised page IV-10.

NRC Comment 6

The changes to Table IV-1 need justification or elimination as they appear to down grade the quality assurance program.

RG&E Clarification 6

The changes to Table IV-1 were not intended to down grade the program. The intent was to regroup the items in the format groupings of ANSI N45.2.13 which was not available when the initial Table IV-1 listing was prepared. In the process of reformation a few of the significant items were inadvertently omitted and are being incorporated into a revised Table. The cross reference of incorporation of previous Table items into the new Table format is as follows:

Table IV 4-1 Rev. 3

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Table IV 4-1 Rev. 5

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deleted as stated but
covered by 2
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4, 5, 6
2
6

NRC Comment 7

The last paragraph on page IV-12 of Revision 4 assigns some responsibilities to Engineering for major modification. Please indicate the assignment of these responsibilities for minor modifications. Also, the same paragraph no longer contains the commitment that "installation requirements" will be provided for modification. Please justify or eliminate this change.

RG&E Clarification 7

Page IV-12 is being revised to clarify to what extent Engineering is responsible for providing drawings and specifications for minor modifications. Engineering installation requirements are not issued separately but are provided in drawings and specifications. The sentence concerning "installation requirements" is describing the types of documents distributed by Engineering and the deletion was to clarify the inconsistent grammar. Page IV-12 provides a description of typical departmental responsibilities associated with the types of documents being provided and activities for which they are typically used.

NRC Comment 8

The last paragraph on page IV-13 and the third paragraph on page IV-20 of Revision 4 no longer require Quality Control review of operating procedures as was required in Revision 3.

RG&E Clarification 8

Operating procedures, unlike maintenance, repair, modification and refueling procedures, do not involve quality assurance requirements and therefore are of little interest to departmental quality representatives. Examples of Quality Assurance requirements characteristic of the other procedures include calibrated tools, inspection and test requirements, witness points, quantitative and qualitative acceptance criteria etc. Operating procedures typically just provide "how to" instructions and precautions to the station operating personnel for system line up and operation. As described in the same paragraph of page IV-13, the Plant Operations Review Committee to which the Station Quality Control Engineer is now a member has review responsibility for all Ginna Station procedures which include the operating procedures.

NRC Comment 9

The second paragraph of IV-7 except suppliers of stand-

ard off-the-shelf items from the commitment that suppliers must be on an approved suppliers list. Please indicate the controls for suppliers of standard off-the-shelf items.

RG&E Clarification 9

Addition of a supplier to the qualified suppliers list is based on satisfactory evaluation of the suppliers capability by Quality Assurance, Purchasing and/or other departments responsible for the procurement of safety related items as described in IV.7. Procurement planning involves determining to what extent the acceptance of off-the-shelf items is to be based upon source inspection, certificate of conformance, receipt inspection and post installation test. For off-the-shelf items, procured from suppliers required to have a quality assurance program and for which item acceptance is based on other than receipt inspection, the supplier must be on an approved suppliers list or in the process of being added to the list. Other off-the-shelf items, that are manufactured to industry standards, are typically utilized in applications other than nuclear and for which item acceptance is based exclusively on receipt inspection may be purchased from sources other than the approved suppliers list. With the exception of the supplier selection method, the controls for all procurements are identical with regard to planning; preparation, review, approval and processing of documents; and item receipt and acceptance. Sections IV.4 and IV.7 will be reviewed and revised to reflect the above clarification.

NRC Comment 10

Please explain the significance of adding "verification" to modify "inspections" in the first two paragraphs of IV-10 of Revision 4.

RG&E Clarification 10

The modifier is to clarify the applicability of inspection controls to the quality assurance function inspections as distinguished from preventative maintenance inspections performed by plant maintenance personnel. Page IV-10 is being revised to provide this clarification.

NRC Comment 11

Revision 4 does not indicate that Engineering is responsible for including inspection requirements in specification as was indicated in Revision 3. Please show who now has that responsibility.

RG&E Clarification 11

Quality Assurance is responsible for the inclusion of inspection requirements in specifications. Page IV-20 is being revised to clarify this responsibility.

NRC Comment 12

Please explain the significance of the changes made

to the last paragraph of IV-11.

RG&E Clarification 12

Quality Assurance now assists Engineering in assuring required tests for modifications are included in specifications. Major modification clarifies scope for which Engineering and Quality Assurance share responsibility for design test requirements. The change in Engineering assistance for test procedure preparation is to clarify that Engineering assistance is not always necessary and especially for minor modification for which they have minimal involvement. Section IV.11, Test Control, is being revised to provide clarification for test responsibility associated with minor modifications.

NRC Comment 13

The last paragraph of IV-14 in Revision 4, does not indicate that Quality Control establishes the procedures for implementing inspection status sheets during maintenance, repair, and modification as was indicated in Revision 3. Please show who now has that responsibility.

RG&E Clarification 13

Since inspection status sheets are not utilized during maintenance, repair and modification, the need for a governing procedure is not necessary. Inspection status sheets, as described in IV.14, indicates a separate form prepared and utilized by Quality Control to track the status of inspection activity (i.e. inservice inspection) which typically involves several inspections during an annual outage. Inspection status for maintenance, repair and modification activities is indicated on job travelers, data sheets, and procedure step sign off locations. This is not clear in the second to the last paragraph and page IV-24 will be revised to provide this clarification.

NRC Comment 14

The third paragraph on page IV-26 of Revision 4 assigns some responsibilities for major design changes. Indicate the assignment of these responsibilities for minor design changes.

RG&E Clarification 14

This paragraph is being clarified to reflect the review by the cognizant design organization (i.e. Engineering or Ginna Station as appropriate).

NRC Comment 15

The commitment in Revision 3 to audit each activity "at least annually" has been changed in Revision 4 to audit each activity "at the required frequency". Revision 4 does not appear to be auditable in this respect. Please clarify.

RG&E Clarification 15

Required audit frequencies, as defined in Technical Specifications 6.0, vary from six months to two years with the majority requiring an annual audit. A six month frequency is specified, for the activity associated with the results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months. A two year frequency is specified for the Station Security Plan and implementing procedures. Table IV 18-1 and the audit schedule include more than just the activities associated with 10CFR50 Appendix B activities which require an audit at least once per year. Page IV-28 is being revised to make reference to Technical Specifications 6.0.

NRC Comment 16

In Revision 4, Table IV 18-1, "Audit List," please justify these omissions or replace the items in the table.

RG&E Clarification 16

With an exception of an inadvertent deletion from the General Maintenance listing, deletions from Revision 3 are to correct some inconsistencies in the listing of activities to be audited with activities for which a department has responsibility. The justification for the deletions are described as follows:

Engineering - Control of Special Processes is not a responsibility of this Organization. It is listed in General Maintenance.

Purchasing and General Maintenance - Deletion of records is to recognize that these departments have chosen to utilize Engineering and Ginna Station for the storage of the records. Auditors are instructed to include record submittals are part of the audit of the other activities.

General Maintenance

- a. Fabrication Control was substituted for Inspection and Surveillance. Fabrication activities for Ginna Station have been minimal for the past couple of years. Inspection and Surveillance is primarily associated with shop fabrication and will be audited commensurate with fabrication control.
- b. Handling, Storage and Shipping was inadvertently deleted and will be reinserted in Table IV.18-1.