

ATTACHMENT 4

ROCHESTER GAS AND ELECTRIC CORPORATION

GINNA STATION

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GINNA STATION
UNIT #1
COMPLETED

DATE :-

TIME :-

PROCEDURE NO. A-401

REV. NO. 9

CONTROL OF PROCUREMENT DOCUMENTS PREPARED AT

GINNA STATION

TECHNICAL REVIEW

PORC REVIEW DATE 6-29-83

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QC REVIEW

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JUL 19 1983

EFFECTIVE DATE

QA α NON-QA _____ CATEGORY 1.0

REVIEWED BY: _____

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A-401CONTROL OF PROCUREMENT DOCUMENTS PREPARED AT GINNA STATION1.0 PURPOSE:

- 1.1 To provide instructions for preparation, content, review and approval of procurement documents for materials, parts, components and services procured under the Ginna Station QA Program requirements, and procured by Ginna Station

2.0 REFERENCES:

- 2.1 QA Manual, Sections 4 and 7, Appendices A and D.
2.2 A-701
2.3 A-702

3.0 INSTRUCTIONS:

- 3.1 The following activities involving procurement are the responsibilities within Ginna Station:
- 3.1.1 Classification of items and services for procurement.
 - 3.1.2 Preparation and content of Material Request Forms and/or Reorder Cards.
 - 3.1.3 Preparation of QA-07 Form(s).
 - 3.1.4 Selection of Procurement Methods.
 - 3.1.5 Purchase Requisition Preparation, Review and Approval.
 - 3.1.6 Purchase Order Distribution.
- 3.2 Classification of Items and Services for Procurement
- 3.2.1 Prior to initiation of purchase requisition, a determination shall be made as to whether the item(s) or service(s) being procured are governed by the Ginna Station Quality Assurance Program. For spare and replacement items this determination shall be made by the Materials Coordinator. For services the determination shall be made by the individuals authorized to initiate the procurement (step 3.3.2).
 - 3.2.2 The classification of items and services to be procured within the scope of this procedure (and QA Program) shall be determined by one of the following methods:

- 3.2.2.1 A review of design documents (drawing, specifications) referencing the item(s).
- 3.2.2.2 A review of past purchase orders for the same items.
- 3.2.2.3 A review of the Quality Assurance Manual Appendix A for Seismic I Structures, Systems Components and consumables.
- 3.2.2.4 A review of the Quality Assurance Manual Appendix D for Fire Protection Systems, Equipment and Structures.
- 3.2.2.5 Procured service is associated with safety related items and/or requires the activity to satisfy applicable QA program requirements.
- 3.2.3 When utilizing Appendix A or Appendix D of the QA Manual, further classification of items not identified in the listing may be necessary. Such classification shall be performed by Engineering upon request.

3.3 Preparation and Content of Material Request Forms and/or Recorder Cards

3.3.1 Spare and replacement items and services shall be procured by initiation of a Material Request Form (Figure 1). The Material Request Form is used as a worksheet for preparation of the Purchase Requisition (Figure 2).

3.3.1.1 If the spare or replacement item is used with a certain frequency, a Reorder Card (Figure 3) and a Spare Parts Inventory Card (Figure 4) maybe established for the items being procured. In this case, the Reorder Card is substituted for the Material Request Form as the worksheet for preparation of the Purchase Requisition.

3.3.2 Material Request Forms/Reorder Cards shall include or reference the following as appropriate:

- ** a. SCOPE OF WORK - A detailed statement of the work to be performed.
- b. TECHNICAL REQUIREMENTS -
- * (1) Complete identification of the item(s) to be procured with reference to specific drawings, specifications, codes, regulations, procedures, or instructions, including revisions thereto.
 - **
 - * (2) Test, inspection and examination requirement
 - *** with corresponding acceptance criteria.

(3.3.2 CONT'D)

- * (3) Special requirements for such activities as
** designing, identification, fabrication, cleaning,
erecting, packaging, handling, shipping and
extended storage as required by ANSI N-45.2
daughter standards.

c. QUALITY ASSURANCE PROGRAM REQUIREMENTS -

- * (1) Requirement that the Supplier has a documented
quality assurance program that implements
portions or all of ANSI N-45.2 and appropriate
ANSI N-45.2 daughter standards (not applicable
for items to be procured by the receipt inspection
method as describe in step 3.5.2.3).
- * (2) Requirement that the Supplier incorporate
appropriate quality assurance program requirements
in subtier procurement documents.

d. RIGHT OF ACCESS -

- * (1) Access rights to the Supplier's plant facilities
and records of inspection or audit by Rochester
Gas and Electric Corporation and/or their
agents. Included should be provisions for
the identification of witness and hold points
and advance notification to cognizant personnel.
- * (2) Provisions for the identification of witness
and hold points and the minimum time of advance
notice and the method of communication of
such notice.

e. DOCUMENTATION REQUIREMENTS -

- ** (1) Documentation to be submitted, including
* quality assurance records for information,
*** review of approval by RG&E and the time of
submittal. Applicable adequacy requirements
as described in Reference 2.2 for written
certification shall also be specified.
- ** (2) Documentation for which retention responsibility
* remains with the Supplier.

f. NONCONFORMANCES -

Requirements for reporting and dispositioning nonconfor-
mances to procurement requirements (not applicable
for items procured by Receipt Inspection Method).

(3.3.2 CONT'D)

* Included in review by Quality Control as described in step 3.4 and 3.6.3.

** Included in review by origination department supervision as described in step 3.6.5.

*** Requirements used to verify the acceptability of an item to comply with technical requirements of drawings and specifications (exclusive of qualification testing) may be specified in a quality verification document prepared by Quality Assurance.

3.3.3 Material Request Forms shall be initiated only by those personnel designated (Purchase Requisition Initiators), in writing, by the Plant Superintendent.

3.3.3.1 Reorder cards are forwarded by Stockroom Personnel to the Materials Coordinator. When Reorder Cards requirements are transcribed on the Purchase Requisition, the Materials Coordinator appears as the PR initiator.

3.3.4 Material Request Forms and/or Reorder Cards are forwarded to the Materials Coordinator for review and processing.

3.3.4.1 The Materials Coordinator shall classify the item or service according to step 3.2.

3.3.4.2 The Materials Coordinator shall review the MR and/or Reorder Cards for inclusion of appropriate technical requirements (to include reference and attachment of applicable drawings, specs., etc.). Requirements for spare or replacement items shall meet at least the original requirements to assure that the item is of comparable quality to the item being replaced.

3.3.4.3 The Materials Coordinator with assistance from Quality Control shall utilize the Standard QA Purchase Order Paragraphs Worksheet (Figure 11), checking the paragraphs that apply to the particular Requisition. On a Reorder Card the applicable paragraph numbers of the Standard QA Purchase Order Paragraphs Worksheet shall be written on the back of the Reorder Card (no worksheet needs to be attached). The Standard QA Purchase Order Paragraphs Worksheet contains standard clauses which should be used to meet the requirements of steps 3.3.2.a thru f.

3.3.5 The Materials Coordinator shall forward the Material Request and/or Reorder Cards* to the QC Engineer or his designee for preparation of QA-07.

* With a copy of any catalog description referenced in the purchase requisition.

3.3.5.1 Copies of catalog descriptions shall be attached to the QA-07 for receipt inspection.

3.4 QA-07 Preparation

3.4.1 The QC Engineer or his designee shall review the Material Request Form and/or Reorder Card for inclusion of quality requirements, compatibility and acceptance criteria to the original design (drawings and specifications). Also in the review are checks to verify that those items identified in step 3.3.2 are included.

3.4.2 A QA-07 Form (Figure 6) shall be prepared by Quality Control for each item of the Material Request and/of Reorder Card. The QA-07 Form shall be used to:

- a. Document the acceptable internal reviews by the Purchasing buyer and QC reviewers.
- b. Document the basis as to whether the item or service being procured is governed by the Quality Assurance Program.
- c. Document the particular method of procurement utilized for the item or service requested.
- d. Delineate the verification activities and documentation which were determined through the acceptance planning activities as necessary for acceptance of the item or service.
- e. Delineate the receipt/approval authority for any designated documents to be provided with the procured items or services.
- f. Document the applicability of 10 CFR Part 21 for the items being purchased.

3.4.2.1 QC shall prepare the QA-07's in accordance with the standardized instructions issued by QC (Figure 11).

3.4.2.2 Planning considerations for preparing the QA-07 shall include a review of the established acceptance criteria and identified documentation to determine the type of verification activities to perform the selection of personnel to perform the activities, the verification methods and when to perform the verification activities. The verification methods that may be selected are:

- a. Written certifications (certificate of conformance or certified test reports).
- b. Supplier surveillance.

(3.4.2.2 CONT'D)

- c. Receipt inspection.
- d. Post installation test.

3.4.2.3 The selected verification method(s) shall be translated on the QA-07 forms during their preparation in the form of inspections, examinations, tests and verification documentation as necessary to satisfy the acceptance criteria for the item or service.

3.4.2.4 Supplier surveillance should be considered when the item or service is vital to plant safety and:

- a. It is difficult to verify quality characteristics of the item or service after receipt on site.
- b. The item or service is complex in design, manufacture, inspection or test.
- c. The item is a new product design or manufacturing concept not purchased before. Surveillance at the suppliers facility is the responsibility of Quality Assurance. When surveillance is specified in the QA-07 as a means of item acceptance, QA shall be listed as the approval authority.

3.4.2.5 Quality Control shall evaluate the need for a specific QC inspection procedure (QCIP) for receipt inspections. Use of QCIP's for a particular purchase shall be based on the complexity of the inspection (as required by design and quality verification documentation) or if the use of calibrated measuring and test equipment is needed for the inspection.

3.5 Selection of the Procurement Method

3.5.1 Included in preparing the QA-07 form(s) for a particular Material Request Form and/or Reorder Card shall be the determination of the procurement method to be utilized for each purchase. The particular procurement method is related to the requirements placed on the Material Request Form and/or Reorder Cards. For materials, parts, components and services, there are generally two categories - Engineered items and off-the-shelf items.

3.5.1.1 Engineered items are those which require a supplier to meet technical and quality requirements which are in excess of common industry related codes, standards or specifications. The additional requirements may be related to USNRC Regulatory Guide commitments, or additional inspections or functional tests which provide more timely assurance of the item's capability to meet the design prior to installation. Such items are generally procured by Engineering and utilize specifications.

- 3.5.1.2 Off-the-shelf items are those that utilize a supplier's standard or proven design, procedures or drawings to meet given technical and quality requirements. Such items are generally mass produced to a manufacturer's or industry standard and are generally procured with reference to a catalog, or supplier's identification number and may be available through a supplier representative (local agent or distributor).
- 3.5.2 Based on the determination made as required by steps 3.2 and 3.5.1, the Materials Coordinator and Quality Control shall select a method of procurement applicable to the particular item(s) and services being procured and consistent with the technical and quality requirements placed on the item(s). The methods of procurement are the Specification method, the Catalog method, and the Receipt Inspection method. Guidance for determining the particular procurement method is contained in Figures 8 and 9.
- 3.5.2.1 The Specification method shall be utilized for procurement of engineered items and services required by imposing Engineering Specifications, A/E Specifications. This method is generally not applicable to purchases relating to spare and replacement items procured by Ginna Station. Items which necessitate procurement by this method should normally be produced by Engineering, upon request.
- 3.5.2.2 The Catalog method shall be utilized for procurement of those off-the-shelf items and services as described in step 3.5.1.2 where by the activities associated with the items or services require a certain degree of quality assurance control by the supplier such as during manufacture, handling, shipping, storage, etc. Off-the-shelf items which require written certification to be utilized as a means of item acceptance are generally procured by the Catalog method.
- 3.5.2.3 The Receipt Inspection method shall be utilized for procurement of off-the-shelf items as describe in step 3.5.1.2 and for which neither quality assurance controls exist nor are necessary to ensure product acceptance. Such items are those that are manufactured to an industry standard and are typically utilized in applications other than nuclear. Off-the-shelf items procured by this method are similar to those procured by the Catalog method except that suppliers of items procured utilizing the Receipt Inspection method need not be evaluated and qualified as required by Section 7 of the Quality Assurance Manual. Items are normally accepted by performing receipt inspection for identification and damage.
- 3.5.3 When choosing the procurement method to be utilized for a particular Material Request Form and/or Reorder Card, Quality Control shall check the appropriate space provided on the QA-07 Form(s).

- 3.5.4 The Material Request Form and/or Reorder Cards with attachments (drawing, specs, QA-07's, etc.) are forwarded to the Materials Coordinator for final review and preparation of the Purchase Requisition.

3.6 Purchase Requisition Preparation, Review and Approval

- 3.6.1 The Materials Coordinator shall have the Purchase Requisition typed, incorporating all information provided on the Material Request Form and/or Reorder Cards and the Standard QA Purchase Requisition Paragraph Worksheet as applicable. In addition, the QA-07's shall be typed, incorporating all information contained on the draft copies supplied.
- 3.6.1.1 Each item of the purchase requisition shall be identified with an item number placed in the column labeled "Bin Number" which should be changed to Item Number".
- 3.6.1.2 Purchase Requisition numbers shall be prefixed by an "N" to distinguish them from non-QA requisitions.
- 3.6.1.3 Purchase Requisition numbers for items procured for the Fire Protection Program shall be prefixed by an "NE" to distinguish them from both QA and non-QA requisitions.
- 3.6.2 The Materials Coordinator shall review the Purchase Requisition for content consistent with the Materials Request Form and/or Reorder Cards and attachments, and forward the package to the Quality Control Engineer or his designee.
- 3.6.3 The Quality Control Engineer or his designee shall review the typed Purchase Requisition, QA-07 form(s) and attachments for those items marked in step 3.3.2, and indicate his acceptable review by signature on the QA-07 form(s) and the Purchase Requisition. Quality Control shall also indicate the appropriate procurement method and 10 CFR 21 applicability on the Purchase Requisition. The Purchase Requisition and attachments will then be forwarded to the authorized Purchase Requisition initiator for review. The QA-07 will be forwarded to the QC Hold area.
- 3.6.3.1 For Purchase Requisition which require supplier surveillance by Quality Assurance, the Quality Control Engineer or his designee shall forward a copy of the purchase Requisition to Quality Assurance, as notification of the need for the future surveillance planning.
- 3.6.4 The Purchase Requisition shall be reviewed for technical adequacy by the Cognizant Staff Supervisor (i.e., Maintenance Engineer, Supervisor of Health Physics, etc., as applicable) and indicate acceptable review by signature on the "Signed By" line of the Purchase Requisition. He shall then forward the package to the Plant Superintendent.

- 3.6.5 The Plant Superintendent shall indicate his approval by signature on the "Approved By" line and forward the package to the Materials Coordinator.
- 3.6.6 The Materials Coordinator shall maintain a copy of the approved Purchase Requisition.
- 3.6.6.1 For spare and replacement materials, parts, and components, and services, purchased by the Specification or Catalog Methods, the Materials Coordinator shall review the Qualified Suppliers List (QSL) to assure proper qualification of the requested supplier. For suppliers of inspection, test and calibration not listed, the Materials Coordinator shall initiate a supplier technical evaluation in accordance with Reference 2.3. For suppliers of new materials or equipment used to support maintenance and operations and not listed, listed, the Materials Coordinator shall initiate an interoffice request for qualification to Purchasing (Figure 10). For suppliers of new materials or equipment used to support maintenance and operations not listed, the Materials Coordinator shall initiate an interoffice request for qualification to Purchasing (Figure 10).
- 3.6.7 The Purchase Requisition and attachments shall be forwarded to the Superintendent, Nuclear Production for authorization and subsequent transmittal to Purchasing.

3.7 Purchase Order Distribution

- 3.7.1 After Purchase Order placement by a Purchasing Buyer, a Purchase Order package is forwarded to the Materials Coordinator from the Purchasing Department. Included in the package will be the following:
- a. Purchase Order (Originating Department Copy - Canary)
 - b. Material Received Reports (Green, Pink, White)
 - c. Purchase Order Copy (copy of P.O. signed by the Purchasing Agent)
 - d. QA-07's (Engineering Purchase Orders)
 - e. Attachments (as applicable)
- 3.7.2 The Materials Coordinator shall retain (a) and (c) above in the office file and forward the remaining documentation to the receiving area.
- 3.7.3 For Purchase Orders originated by Engineering, the package, less Purchase Order, Canary Copy, is forwarded by Engineering to the Modification Project who in turn will forward to the Materials Coordinator those purchase orders to be received by Ginna Station.



3.8 Miscellaneous

- 3.8.1 When stocked off-the-shelf items that have been procured commercially outside the quality assurance procurement document control requirements, have to be upgraded for use in safety-related applications, the QA-07 form shall be utilized by the Quality Control Engineer or his designee to delineate inspection, test, and documentation requirements necessary for item acceptance. Such items shall be treated the same as those procured by the Receipt Inspection method with the exception that the original procurement was by commercial methods.
- 3.8.2 Procurement of material, parts, components or services from their utilities shall be completed as required in 3.1 through 3.7 of this section. In either method, the evaluation must assure that the item to be received can satisfy the procurement technical and quality requirements.
- 3.8.3 Additions, modifications, exceptions, and other changes to a purchase order or documents referenced on the purchase order shall be initiated by preparation, review, approval and issuance of additional pages to the purchase requisition/purchase order as per 3.3 through 3.6.
- 3.8.3.1 When a purchase order is cancelled, i.e., additional page of the purchase order written to cancel per 3.8.3, new QA-07(s) need not be prepared by Quality Control.
- 3.8.3.2 Under no circumstances shall purchasing requirements be altered (except for pricing and quantity) during order placement unless review and concurrence is obtained from those who were required to review, concur with, and approve the original documents.
- 4.0 RECORDS:
- 4.1 The Purchase Requisition approved copy shall be submitted by the Materials Coordinator to Central Records following Purchase Requisition approval.

2.2 EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS)

2.2.1.1 Equipment identified as safety-related is that which is necessary to assure:

1. the integrity of the reactor coolant pressure boundary,
2. the capability to shut down the reactor and maintain it in a safe shutdown condition, or
3. the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the guideline exposures of 10 CFR 100.

2.2.1.2 The method of identifying safety-related components is through Appendix A to the Ginna Station Quality Assurance Manual (see response 2.1.) Currently Ginna is developing a computerized maintenance management system, "COMMS", to address management controls of maintenance activities. This system will include programs to address systems, components, and parts. Each program, while part of the entire system, will be unique to itself and will communicate with the other programs. For instance, the system program will allow a user to identify all components within the system and the component's program will allow for identification of the parts associated with this component. When fully developed, this system will be in agreement with Appendix A of the Ginna QA Manual. At present, information is being added to the database, a project which is scheduled to be concluded by the end of 1984. Presently, an existing manual listing is used to identify safety-related components.

2.2.1.3 The mechanism used to determine whether an activity, system, or component is safety-related or non-safety related is the Quality Assurance Manual and its Appendices.

Appendix A contains a listing of quality and safety-related items and diagrams. These diagrams and listings are used for determining safety-related structures, systems and components. The information is based on the list contained in Section 1.2.1 of the FSAR. Activities affecting the quality of safety-related structures, systems, and components are controlled to an extent consistent with their importance to safety.

The QA program covers all existing Seismic Class I components, structures, systems, and certain non-seismically designed structures, systems, and components may also be covered.

Plant procedures, marked QA and Non-QA, Technical Specifications, Engineering Specifications and other codes and specifications are also used.

- 2.2.1.4 During the recent past, most efforts have been aimed at developing a data base for safety-related equipment. As familiarity with data entry increases, more time and effort will be spent developing the management controls necessary to assure that procedures for preparation, validation, and routine utilization of the information handling system have been followed. It is proposed that these procedures be part of the plant administrative procedures series which will assure the same PORC review and superintendent approval as applies to all plant procedures. This development of procedures will occur by the end of 1984.
- 2.2.1.5 The present design control process insures that appropriate design verification is performed and that the appropriate qualification testing is specified for the procurement of safety-related components. For example, in order to upgrade safety-related instrumentation at the Ginna Power Plant, new and qualified transmitters were ordered under purchase orders dating from June 13, 1980. Purchase orders specified that material be supplied which is qualified to IEEE standards. RG&E received certification that the equipment supplied does comply or will when converted comply with the specified IEEE standards. (It should be noted that a circuit card was not available at the time of shipment on some orders but has since been received from Foxboro and will be installed during the 1984 refueling outage. Documentation to support the limits of life recommended by the supplier was also supplied.
- 2.2.1.6 When RG&E reviews Appendix A to the Quality Assurance Manual for Ginna Station, the equipment classification of "important to safety" will be reviewed. A listing of this classification will be included when this document is finalized.
- 2.2.2 Within the administrative computer, a vendor manuals data base exists which contains all of the plant's vendor information that is located at the station. This data base will be refined to remove duplicate and outdated manuals. A complete program of vendor interface will be established following receipt of the INPO NUTAC report on this issue.

3.1

POST-MAINTENANCE TESTING (REACTOR TRIP SYSTEM COMPONENTS)

3.2

POST-MAINTENANCE TESTING (ALL OTHER SAFETY-RELATED COMPONENTS)

1. Earlier this year, a review of all maintenance procedures was conducted to assure that proper post-maintenance testing is being performed. This review was completed in June of 1983 and necessary changes have already been incorporated. Additional reviews of administrative controls governing the preparation of maintenance procedures, emergency maintenance procedures, and system modification procedures have been performed. As a result of this review, administrative controls have been strengthened to more adequately address post-maintenance testing of safety-related equipment, including reactor trip system components.

A comprehensive independent review of the Technical Specifications has been performed and all required surveillance testing is currently included in the surveillance program and is being tested at the required frequencies. For the most part the same surveillance tests that are used for demonstrating the operability of safety-related components are also used for post-maintenance testing.

2. Vendor recommendations are being addressed by means of implementing the operational assessment program. In addition to reviewing the operational activities at other power plants, vendor recommendations are also technically assessed by this program. This has been an ongoing program since its inception in 1980.

Engineering recommendations related to the topic of testing are generally in the form of test specifications. These specifications are converted to test procedures and receive a full PORC review before implementation. This continued action should be sufficient to ensure that any appropriate test guidance is included in the applicable procedures.

3. No post-maintenance test requirements, which are in the existing Technical Specifications, have been identified at this time that degrade rather than enhance safety.

4.1 REACTOR TRIP SYSTEM RELIABILITY (VENDOR-RELATED MODIFICATIONS)

A review of Westinghouse correspondence to Rochester Gas and Electric Corporation concerning the Ginna DB-50 reactor trip breakers has identified only two recommended modifications. The first was NCD-ELEC-18, dated December 17, 1971, titled "Replacement of Undervoltage Attachments on Breakers in Reactor Trip Switchgear." This modification was completed in 1972. The second modification was recommended in Westinghouse letter RG&E 83-596, dated May 9, 1983, which suggested that the reactor trip breakers be inspected for the presence of unused overcurrent trip brackets. If the brackets existed, it was recommended that they be removed. This was completed in May of 1983.

4.2 REACTOR TRIP SYSTEM RELIABILITY (PREVENTIVE MAINTENANCE AND SURVEILLANCE PROGRAM FOR REACTOR TRIP BREAKERS)

4.2.1 Ginna Station maintenance performs preventive maintenance on the reactor trip breakers each refueling outage. This maintenance is performed in accordance with a detailed maintenance procedure M-32.2 (Attachment 5) which addresses cleaning, inspection for loose and worn parts, lubrication, and testing. This procedure is in accordance with Westinghouse Technical Bulletin NSD-TB-83-02, DB-50 Reactor Trip Breaker Maintenance.

4.2.2 Trending the performance of the reactor trip breakers has started with the 1983 refueling outage. Response time testing of each reactor trip breaker has been performed. The test data is currently being used to establish base line data for determining degradation. Specifically the breaker response time testing program will be modified to include the two diverse tripping features and will be performed prior to routine maintenance. The undervoltage trip coil and the shunt trip coil will be independently tested.

Mechanical trending is also being performed and consists of monitoring critical clearances on the breaker mechanisms per the manufacturer's recommendations. Presently, clearances are recorded prior to any adjustments. The "as found" and "as left" dimensions are recorded and are currently being trended. In addition, any signs of rubbing or wear are recorded and corrective action will be taken when noted.

4.2.3 Component Life Testing

Life Testing of the shunt trip and the undervoltage trip attachments to the DB breakers is being conducted by Westinghouse for the Westinghouse Owners Group. The program will establish the service life for this trip attachment. Once established, the data will be used to substantiate periodic testing requirements which will be documented into plant procedures on a timely basis.

4.2.4 The life testing data will also be used as a basis for selecting periodic replacement intervals for these two attachments. This information will be factored into existing Ginna Station maintenance procedures when available.