

REVIEW (Continued)

- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Plant Operations Review Committee.

AUDITS

6.5.2.8 The NSARB shall direct the establishment of an audit program and evaluate audits performed to ensure safe facility operation. Audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the operating and technical staff at least once a year.
- c. 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.
- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, at least once per year.
- e. The Radiation Emergency Plan and implementing procedures at least at the frequency required by 10 CFR 50.54(t).
- f. The Station Security Plan and implementing procedures at least at the frequency required by 10 CFR 73.40(d).

Attachment B

NRC Generic Letter No. 82-17, dated October 1, 1982, from Darrell G. Eisenhut, identified a potential inconsistency between 10 CFR 50.54(t) and plant Technical Specifications for frequency of audits. A review of the Ginna Technical Specifications confirms that an inconsistency does exist. 10 CFR 50.54(t) requires audits annually while the plant Technical Specifications require audits at least every 2 years. The proposed change will revise the frequency by incorporating a reference to 10 CFR 50.54(t).

An NRC letter dated October 30, 1982 from Mr. Eisenhut noted that a similar situation also exists with regard to audits of the Security Plan. 10 CFR 73.40(d) requires annual audits while the Ginna Technical Specifications require audits at least every 2 years. A similar change is proposed to resolve this inconsistency.

These changes do not change audit frequencies, since they have been performed consistent with 10 CFR.