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JOHNSON, A.R. Project Directorate I-3

SUBJECT: Forwards Rev 16 to "QA Program for Station Operation," per  
10CFR50.54. Rev involves changes in mgt, engineering &  
production organizations.

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December 21, 1990

U. S. Nuclear Regulatory Commission  
Document Control Desk  
ATTN: Mr. Allen R. Johnson  
Project Directorate I-3  
Washington, DC 20555

SUBJECT: Submittal of Quality Assurance Program  
R. E. Ginna Nuclear Power Plant  
Docket Number 50-244

Dear Mr. Johnson:

In accordance with 50.54 of 10CFR Part 50, enclosed is revision 16 to the Quality Assurance Program for Station Operation. The revision involves minor changes in the RG&E Management, Engineering and Ginna Nuclear Production organizations. The realignment of the Nuclear Engineering Services group from Engineering to Ginna Nuclear Production also recently occurred. Further details of these and other changes and related reasons are described in the following paragraphs.

Summary of Revision 16 Changes

Section 1 Quality Assurance Program

- Changes to titles and typographical errors

Section 2 Organization

- Changed or deleted from the listing of positions responsible for the principal elements of the QA Program: Vice President, Ginna Nuclear Production (renamed from General Manager, Nuclear Production)  
Division Manager and Chief Engineer (renamed from Chief Engineer)

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Department Manager, Nuclear Engineering Services (renamed from Director, Nuclear Engineering Services)  
Department Superintendent, Electric Substations Department (renamed from Superintendent, Electric Substations)  
Department Manager and Purchasing Agent, Materials Management (renamed from Purchasing Agent)  
Department Superintendent, General Maintenance (renamed from Superintendent, General Maintenance)  
Department Manager, Production Division Training (renamed from Division Training Manager)  
Deleted Manager, Divisional Services and Quality Services Coordinator and reassigned their responsibilities to the Division Manager and Chief Engineer

- The position descriptions for the revised titles are revised to reflect the appropriate changes. The more significant among these are:

Reassignment of Department Manager, Nuclear Engineering Services' reporting responsibility from the Division Manager and Chief Engineer to the Vice President, Ginna Nuclear Production.

Reassignment of responsibilities from the deleted positions of Manager, Divisional Services and Quality Services Coordinator to the Division Manager and Chief Engineer.  
Revision to Figures 2-1, 2-3, 2-4 and 2-5 to reflect the changes to the position titles.

### Section 3 Design Control

- Appropriate title changes and one minor clarification.

### Section 4 Procurement Document Control

- One title change.

### Section 5 Instructions, Procedures and Drawings

- Appropriate title changes.

### Section 6 Document Control

- Appropriate title changes and minor clarifications.

### Section 7 Control of Purchased Material, Equipment and Services

- Appropriate title changes and minor clarifications.

### Section 8 Identification and Control of Materials, Parts and Components

- One title change.

### Section 9 Control of Special Processes

- Appropriate title changes and minor clarifications.

### Section 10 Inspection

- Clarification that the Manager, Nuclear Assurance is also responsible for assuring adequate inspection requirements are included in instructions.

### Section 11 Test Control

- Added clarification that checks or tests used to verify adequacy of maintenance may be performed in accordance with instructions, procedures or drawings.
- Appropriate title changes.

### Section 12 Control of Measuring and Test Equipment

- One title change.

### Section 13 Handling Storage and Shipping

- Appropriate title changes and one clarification.

### Section 14 Inspection, Test and Operating Status

- Minor clarifications.

### Section 15 Nonconforming Materials, Parts and Components

- Reorganization of process to reflect new organization and clarification of responsibilities.

### Section 16 Corrective Action

- Clarification of reporting a significant condition adverse to quality.
- Deleted one paragraph to remove redundancy and made one clarification associated with the deletion.

### Section 17 Quality Assurance Records

- Appropriate title changes and one minor clarification.

### Section 18 Audits

- Changes made to reflect the change of approach from compliance type audits to more performance based audits in performance areas.
- Appropriate title changes.

- Deleted explicit reference to annual audit frequency while retaining reference to the frequency specified in Technical Specifications, Section 6.0.

Table 1-1 Tables of Departmental Implementing Procedures

- Training of Quality Assurance/Quality Control Personnel changed from Training of Quality Assurance Personnel.

Table 4-1 procurement Document Requirements

- Added requirement number 7 for shelf life information.

Table 18-1 Audit List

- Rewrote entire table to reflect functional scope of audits instead of organizational scope. This supports a more performance based assessment of activities.

Figure 2-3 Ginna Nuclear Production Organization

- Revised to be more consistent with the other organization charts.

Miscellaneous

- Typographical and editorial changes incorporated throughout the document where deemed appropriate.

All changes from previous revision 15 are identified with a vertical line in the left hand margin of each page. Each page will be identified as revision 16 since the entire document was reprinted in lieu of only the revised pages.

Tables and figures which contain changes are identified by a vertical line in the left margin next to their reference in the index, page ii.

These changes will not reduce the effectiveness of the Ginna Station Quality Assurance Program nor reduce any of our previous commitments. This is based on the following considerations:

- The change which has the Department Manager, Nuclear Engineering Services reporting to the Vice President, Ginna Nuclear Production was made to enhance cooperation between the design and operating organizations. The responsibilities and requirements of the Nuclear Engineering Services organization have not changed.
- The change which caused the deletion of the Department Manager, Divisional Services and the Quality Services Coordinator, as positions responsible for principal elements of the quality assurance program was made to consolidate management responsibilities as a result of the shift of Nuclear Engineering Services and recent managerial vacancy.

The responsibilities of the Department Manager, Divisional Services has been assigned to the Division Manager and Chief Engineer while the Quality Services Coordinator remains in the Divisional Services organization in a somewhat reduced capacity.

- The changes made to the nonconformance report process are due to a revision to the process to reflect organizational realignments. The changes do not result in the deletion of any commitments; they reflect the reassignment of responsibilities.
- The changes to the audit process and Table 18-1 reflect a redirection of the audit process from compliance based toward a more performance based approach. The audit of major functions will assure that those organizations involved in the function are audited as well as their interfaces. Recognizing that the audit frequencies are specified in Technical Specifications, Section 6.0 deletion of reference to annual frequency in this submittal will preclude commitment document inconsistencies should future frequency changes be made. Section 18 will continue to make reference to Technical Specifications, Section 6.0.

Very truly yours,



Robert C. Mecredy  
Vice President,  
Ginna Nuclear Production

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Enclosures

xc: T. Moslak, Senior Resident Inspector Region 1