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See Rpt.

SUBJECT: Forwards Rev 17 to "QA Program for Station Operation." Revs
 involve minor changes in responsibilities for QA program
 implementation.

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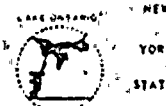
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December 20, 1991

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 17 to the Quality Assurance Program for Station Operation. The revision involves minor changes in the responsibilities for Quality Assurance Program Implementation. The realignment of responsibilities resulted in the removal of the General Maintenance Department from the Quality Assurance Program as the department is no longer responsible for performing any Quality Assurance Program activities. Further details of these and other changes and related reasons are described in the following paragraphs.

Summary of Revision 17 Changes

Section 1 Quality Assurance Program

- Changes to titles and responsibilities
- Clarification of responsibilities in regards to radwaste shipping containers
- Change to location of detailed listing of structures, systems and components covered by the Quality Assurance Program.
- Correction to one commitment reference. Changed from ANSI N45.2.12 to Regulatory Guide 1.144, Revision 1 to maintain consistency.

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Section 2 Organization

- Changed or deleted from the listing of positions responsible for the principal elements of the QA Program:

(Chairman of the Board, President and CEO (combined Chairman of the Board and CEO with the President's position as the responsibility of one individual)

Division Manager, Technical Services and Chief Engineer (renamed from Department Manager and Chief Engineer)

Department Manager, Production and Engineering Systems (added)

Department Superintendent, General Maintenance (Deleted and responsibilities reassigned)

Department Superintendent, Electric Laboratory and Telecommunication (addition)

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

The position of Chairman of the Board and Chief Executive Officer and the position of President have been combined into one position.

The responsibilities assigned to the General Maintenance Department have been reassigned to the Production Division Training Department, Ginna Station and Materials Engineering and Inspection Services. General Maintenance personnel assigned to perform activities associated with the Quality Assurance Program will do so under the supervision of department requiring their assistance.

Section 3 Design Control

- Appropriate title and responsibility changes.

Section 4 Procurement Document Control

- Two responsibility changes.

Section 5 Instructions, Procedures and Drawings

- Deleted General Maintenance procedure requirements and clarified responsibility for inspection procedures.

Section 6 Document Control

- Appropriate responsibility changes and minor clarifications.

Section 7 Control of Purchased Material, Equipment and Services

- Appropriate responsibility changes and minor clarifications.

Section 8 Identification and Control of Materials, Parts and Components

- No changes.

Section 9 Control of Special Processes

- One responsibility change.

Section 10 Inspection

- One title change and one minor clarification that Nuclear Assurance is responsible for inspecting Quality Assurance Program Activities for Ginna Station.

Section 11 Test Control

- One minor clarification

Section 12 Control of Measuring and Test Equipment

- One responsibility change.

Section 13 Handling Storage and Shipping

- Appropriate responsibility changes and one clarification.

Section 14 Inspection, Test and Operating Status

- Clarifications and one sentence deleted for redundancy dealing with the identification of responsibility for tagging.

Section 15 Nonconforming Materials, Parts and Components

- Corrected grammatical errors.

Section 16 Corrective Action

- Clarification of corrective action report review responsibilities.
- Other appropriate responsibility and title changes and minor clarifications.

Section 17 Quality Assurance Records

- Appropriate responsibility and title changes.

Section 18 Audits

- No changes.

Table 1-1 Tables of Departmental Implementing Procedures

- Deleted listing of General Maintenance Procedures.
- Added Production Division Training Procedures as a category; however, their Quality Assurance Program procedure manual is being developed. In the interim they are using applicable Ginna Station procedures.
- Some additions to the other procedure listings.

Table 4-1 Procurement Document Requirements

- Deleted requirement number 7 for shelf life information as this is now incorporated as part of requirement number 2 for technical requirements. This change was made as not all procurements require shelf life consideration.

Table 18-1 Audit List

- Minor changes to listing to reflect some consolidation of audit topics. Software QA audit is being deleted as this area will be examined as it applies to each of the audit areas.

Figures 2-1 through 2-5

- Revised to reflect current organization.

Miscellaneous

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

All changes from previous revision 16 are identified with a vertical line in the left hand margin of each page. Each page will be identified as revision 17 since the entire document was reprinted in lieu of only the revised pages.

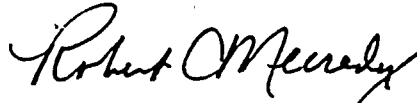
Tables and figures which contain changes are identified by a vertical line in the left margin next to their reference in the index, page ii.

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 resulted in deleting the General Maintenance Department did not result in a decrease in commitments, only a reassignment of those responsibilities to organizations currently responsible for implementing them.

The other title and responsibility changes did not reduce any commitments but reflect organizationally based changes to improve Rochester Gas and Electric's ability to safely, legally and efficiently implement the Quality Assurance Program requirements and intent.

Very truly yours,



Robert C. Mecredy
Vice President,
Ginna Nuclear Production

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Enclosures

xc: T. Moslak, Senior Resident Inspector Region 1