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See Report R

SUBJECT: Forwards Rev 18 to "QA Program for Station Operation," for I
 Dec 1992. Rev 18 includes changes in commitment for sets of
 responsibilities. D

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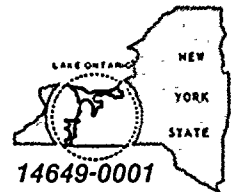
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August 5, 1993

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

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

Dear Mr. Johnson:

In accordance with 10 CFR 50.54 enclosed is a modified revision 18 to the Quality Assurance Program for Station Operation transmitted to you on December 30, 1992. This revised submittal provides information in response to questions raised during phone conferences with NRC Region I reviewer, Fred Bower. Revision 18 includes changes in commitment for two sets of responsibilities.

The first change is to remove the requirement for Quality Performance to concur on procedures directly implementing the quality assurance program. This change involves a change in commitment, but is not considered to be a reduction in effectiveness as the responsibility for Quality Assurance review of procedures still exists and Quality Performance assessment of these activities has increased due to the initiation of the Quality Assurance Surveillance program. The responsibility for procedure adequacy belongs solely to the responsible management of the associated activities. This reinforcement of line organization responsibility for procedure adequacy is being adopted throughout the industry.

The second responsibility change involving a change to commitment removes Quality Assurance responsibility for reviewing corrective action reports to assure that the cause was determined and that adequate corrective action has been taken to preclude recurrence. This activity is currently assigned to and is being performed by the Plant Operations Review Committee CAR subcommittee in addition to Quality Assurance. Quality Assurance performs two audits annually of the corrective action program as required by Technical Specification 6.5.2.8. In addition, this area is assessed by Quality Assurance surveillances, as items that are significant conditions adverse to quality are often Quality Assurance surveillance topics or have in process Quality Assurance involvement. Deleting Quality Assurance review and concurrence from what has been a redundant independent review will have no impact on the commitment for independently assuring the adequate identification of actions being taken to preclude recurrence.

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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 removal of Quality Performance from concurrence with procedures is compensated by assignment of that responsibility to responsible management and by audits and surveillances of procedure adequacy and implementation by Quality Performance.
- The removal of Quality Assurance review and concurrence with corrective action reports cause determination and action to preclude recurrence is compensated by the Plant Operations Review Committee CAR Subcommittee performing this task and by audits and surveillance being performed of both the corrective action program and individual corrective action reports.
- The other title and responsibility changes do not reduce any commitments but reflect organizational changes to improve Rochester Gas and Electric's ability to safely, legally and efficiently implement the Quality Assurance Program requirements and intent.

Changes made to revision 17 of the Quality Assurance Program for station operation are denoted by a single revision bar in the left margin.

Very truly yours,


Robert C. Mecredy

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Enclosures

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Mr. Fred Bower
U.S. Nuclear Regulatory Commission
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475 Allendale Road
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Ginna Senior Resident Inspector

ATTACHMENT 1

Summary of Revision 18 Changes

Section 1 Quality Assurance Program

- Quality performance no longer concurs with new procedures and changes but will assure procedure adequacy through review and through audits and surveillances of a sample of new procedures and procedure changes.
- Clarification to location of detailed listing of structures, systems and components covered by the Quality Assurance Program.
- The 4th Paragraph sentence was removed to allow controlled procedures to be maintained in any controlled environment, such as a computer database.

Section 2 Organization

- Identified that Ginna Station in lieu of Quality Performance has a responsibility for assuring that significant conditions adverse to quality are identified and corrected.
- Identified that Nuclear Engineering Services, and Quality Performance have a responsibility for tracking and providing report summaries for conditions adverse to quality. This responsibility was reassigned from the Manager, Quality Assurance.
- Identified that Nuclear Engineering Services is responsible for providing Technical Support to Ginna Station.
- Clarified the reporting relationships for the Manager, Material Engineering and Inspection Services.

Section 3 Design Control

- Appropriate title and responsibility changes.

Section 4 Procurement Document Control

- No changes.

Section 5 Instructions, Procedures and Drawings

- Quality Performance will no longer concur with new or revised procedures implementing the quality assurance program.
- Through audits, surveillances and verification inspections, Quality Performance is responsible for verifying commitments are addressed.
- Other editorial changes.

Att. 1

Section 6 Document Control

- Quality Performance will no longer concur with new or revised procedures implementing the quality assurance program.
- Minor clarifications and editorial changes.

Section 7 Control of Purchased Material, Equipment and Services

- Minor responsibility changes, clarifications and editorial changes.

Section 8 Identification and Control of Materials, Parts and Components

- Removed one redundant sentence and clarified that the subject activities are to be accomplished in accordance with approved procedures.

Section 9 Control of Special Processes

- No changes.

Section 10 Inspection

- Consolidated two mostly redundant paragraphs into one concerning inclusion of hold points and inspection requirements in instructions, procedures and fabrication processes.
- Changed Nuclear Assurance requirement to do all inspections to Nuclear Assurance is responsible for assuring inspections are done by properly trained and certified personnel.

Section 11 Test Control

- No changes.

Section 12 Control of Measuring and Test Equipment

- No changes.

Section 13 Handling Storage and Shipping

- Added Nuclear Engineering Services responsibility for reviewing engineering specifications on this subject.

Section 14 Inspection, Test and Operating Status

- No changes.

Section 15 Nonconforming Materials, Parts and Components

- Minor clarifications.

Section 16 Corrective Action

- Changes to definition of a condition adverse to quality and a significant condition adverse to quality were made to remove the list of potential causes of these conditions and replace them with a descriptive definition.
- The responsibilities and processes for handling significant conditions adverse to quality were clarified and reassigned to those organizations currently responsible. The Plant Operations Review Committee CAR Subcommittee is replacing Quality Assurance as the independent review group assuring that adequate corrective action has been taken to preclude recurrence. Quality Assurance oversight of this process will be by audit and surveillance of the program and selected corrective action reports.

Section 17 Quality Assurance Records

- Clarified that Production and Engineering Systems is solely responsible for maintaining and retaining quality assurance records.

Section 18 Audits

- Minor correction to text inadvertently left out of revision 17 submittal.

Table 1-1 Tables of Departmental Implementing Procedures

- Changes reflect significant procedure improvement activities for 1992. Production Division Training procedure manual has been issued and is reflected in the table.

Table 4-1 Procurement Document Requirements

- No changes.

Table 18-1 Audit List

- No changes

Figures 2-1 through 2-6

- Minor changes; none which affect quality assurance program activities.

Miscellaneous

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

Att. 1

All changes from previous revision 17 are identified with a vertical line in the left hand margin of each page. Each page will be identified as revision 18 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.