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Vice President  
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August 16, 1994

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-3  
Washington, D.C. 20555

Subject: Revised Submittal of Quality Assurance Program for  
Station Operation  
Rochester Gas & Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

- References:
- a. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Revised Submittal of Quality Assurance Program for Station Operation," dated May 16, 1994.
  - b. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Application for Amendment to Facility Operating License, Upgrade of Administrative Controls Section 6.0," dated May 13, 1994.
  - c. Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, Subject: "Review of Proposed Amendment to Technical Specification 6.5.1, 'Plant Operations Review Committee (PORC) Function,' R.E. Ginna Nuclear Power Plant - Request for Additional Information (TAC No. M83569)", dated November 12, 1992.

Dear Mr. Johnson,

In accordance with 10CFR50.54(a)(3), enclosed is revision 20 to the Quality Assurance (QA) Program for Station Operation. This revision 20 supersedes in its entirety, the proposed revision 20 as submitted on May 16, 1994 (Ref. a.). This submittal addresses all comments provided by the NRC during a conference call held with RG&E on August 3, 1994 with respect to the License Amendment Request (LAR) associated with the Administrative Controls Section 6.0 of the Technical Specifications (Ref. b.). In addition, the NRC comments provided in Reference c. are also addressed within the enclosed revision 20 as requested during the August 3rd conference call.

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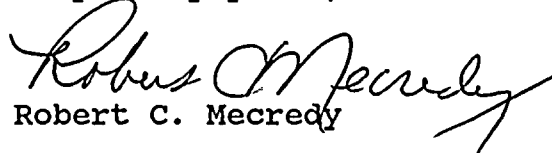
While the previously proposed revision 20 to the QA Program is superseded by the enclosed document, only certain sections have changed. These changes are summarized below by QA Program Section number:

- a. Section 1 - References to ANSI/ANS 3.1-1987 and ANSI/ANS 3.2-1988 are provided.
- b. Section 2 - Additional details concerning the PORC and NSARB are provided. This includes providing specific requirements for the PORC consistent with Technical Specification 6.5.1 and addressing NSARB member qualifications and record keeping requirements.
- c. Section 6 - A description of a new procedure change review process is provided.

The changes to the QA Program are described in the attached Synopsis of Changes (Attachment 1) and in the enclosed program revision. Attachment 1 also provides the basis for concluding that the revised program continues to satisfy the 10CFR50, Appendix B criteria and does not reduce the scope of the quality assurance program. Changes made to revision 19 of the QA Program for Station Operation are denoted by a single revision bar in the left margin. Attachment 2 is a copy of the enclosure with changes highlighted or struck out.

We request that upon NRC approval, the QA Program changes should be considered effective immediately and implemented concurrent with the implementation of the technical specification changes being requested in Reference a.

Very truly yours,

  
Robert C. Mecredy

MDF\625

xc: Mr. Allen R. Johnson (Mail Stop 14D1)  
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Ginna Senior Resident Inspector

## ATTACHMENT 1

### Synopsis of Changes

#### Section 1 Quality Assurance Program

References to NRC Regulatory Guide 1.33, Revision 2, Regulatory Positions 1, 3, and 5a only was added to support the License Amendment Request (LAR) related to reformatting the Administrative Controls Section of Technical Specifications. Regulatory Positions 3 and 5a with respect to ANSI N18.7-1976, Sections 4.3.2 and 4.3.4, are related to changes discussed below while Regulatory Position 1 relates to the LAR which proposes to use Revision 2 of Appendix A to Regulatory Guide 1.33 instead of Revision 0 (Technical Specification 6.8.1.a).

References to ANSI/ANS 3.1-1987, Section 4.7, and ANSI/ANS 3.2-1988, Sections 4.2 and 4.3, were also added to support changes discussed in Section 2 below. These standards were added since they contain PORC and NSARB requirements not provided in earlier ANSI N18.7 editions.

This change requires NRC approval prior to being implemented.

#### Section 2 Organization

The description of the review and audit organizational units shown in Figure 2-6 is expanded since these items are being relocated from Technical Specifications to the QA Program. A reference to ANSI/ANS 3.2-1988 Section 4.3 is now provided for the onsite review function (i.e., the Plant Operations Review Committee) and ANSI N18.7-1976, Sections 4.3.2 and 4.3.4, and ANSI/ANS 3.1-1987 Section 4.7 for the offsite review and audit function (i.e., the Nuclear Safety Audit and Review Board). ANSI N18.7-1976 is an NRC endorsed standard while ANSI/ANS 3.1-1987 and ANSI/ANS 3.2-1988 are not. However, these ANSI standards provide equivalent or more conservative requirements than those currently listed in Technical Specifications (TS).

Section 2 now includes the requirements under which the PORC and NSARB are composed and function. These requirements were relocated from the Technical Specifications. Several requirements were modified in order to conform to the ANSI Standards or to create a more efficient review and audit organizational unit. These changes do not result in any reduction in the level of detail or safety currently included in the Technical Specifications. Where differences do exist, justification is presented below. These differences are marked with an asterisk (\*). Itemized below is each existing Technical Specification in 6.5.1 and 6.5.2 and its relationship to the QA Program. References to the QA Program paragraphs refer to the end of Section 2 of the Program document. (Please note that these paragraph numbers are removed in Attachment 2.)



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1. TS 6.5.1.1 - The essence of this current specification is included in the QA Program paragraph 2. Paragraphs 1. and 2. were taken directly from ANSI Standard N18.7-1976, Section 4.4.
2. \*TS 6.5.1.2 - RG&E submitted an LAR dated March 23, 1992 requesting that the titles of PORC personnel be replaced with functional areas under PORC review. This would allow PORC member title changes as long as the functional areas are maintained. The NRC responded to this LAR in a letter dated November 12, 1992 requesting additional information regarding the number of PORC members. In moving the requirements to the QA Program, paragraph 3., the functional areas of the PORC are included. These functional areas have been chosen to agree with the current PORC functions as performed by the personnel whose titles are listed in the Technical Specifications. The number of regular members is now listed in the QA Program, paragraph 4, as a minimum of 5 and maximum of 9 (8 functional areas plus chairman). This resolves the comment in NRC letter dated November 12, 1992. The number of functional areas delineated in the QA Program is 8. The current Technical Specifications list the Titles of 12 individuals. This difference is not a reduction in safety, because the functional areas necessary to perform adequate reviews by PORC are encompassed.
3. TS 6.5.1.3 - This requirement is included in the QA Program, paragraph 4.
4. TS 6.5.1.4 - This requirement is included in the QA Program, paragraph 4.
5. \*TS 6.5.1.5 - This requirement is included in the QA Program, paragraph 3. and 4. The QA Program states that the quorum size meets ANSI/ANS 3.2-1988, Section 4.3, which requires a quorum consisting of a chairman or a duly appointed alternate and a majority of the remaining members or their duly appointed alternates. In addition, paragraph 4. of the QA Program requires that the number of alternates will not exceed a minority of the number making up the quorum. This combination of requirements meets both the ANSI standard and the comment made by the NRC in a letter dated November 12, 1992 that if the number of members "is not a fixed number, then the quorum requirement of Section 6.5.1.5 should be revised to reflect the staff position that the quorum should be a majority of the regular members." Procedure A-205, will implement this QA Program requirement.



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6. TS 6.5.1.6 - This specification covers the PORC scope of review. The QA Program requires that the PORC scope of review meet ANSI/ANS 3.2-1988, Section 4.3.1. In citing this ANSI Standard, not all of the specific items in the existing Specification are individually listed, however, the PORC scope of review is not reduced. Additional information is provided in items 7. through 15. below.
7. \*TS 6.5.1.6 a, b, d - The ANSI Standard requires that the PORC review all safety evaluations required under 10CFR50.59. RG&E's safety evaluation process requires an assessment or screening of all plant changes to determine their safety significance and the need to perform a written safety evaluation. 10CFR50.59 encompasses changes to the facility, changes to procedures, and tests and experiments. Therefore, in citing the ANSI Standard, PORC review of the subject areas specified in TS 6.5.1.6.a, b, and d are encompassed.

With respect to procedure changes, many procedure changes are editorial or inconsequential and have no safety significance. Therefore, it is appropriate to employ a process whereby an independent technical review is performed of the proposed procedure change. A qualified and independent reviewer, appointed by PORC or the Plant Manager, will also conduct a review of the proposed procedure change to determine its potential safety significance and the need for a PORC review. The absence of such an independent review essentially forces PORC to conduct a review of all proposed procedure changes that have no significance, instead of the group of those changes that potentially may impact safety. All changes that receive a written safety evaluation under 10CFR50.59 are required to be reviewed by PORC. Others may not result in an impact on safety and a written safety evaluation, but are selected for PORC review by the independent and qualified reviewer. The remaining changes have no safety significance, are editorial or inconsequential and do not require PORC review. This process is described in the QA Program, Section 6.

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8. TS 6.5.1.6.c - This requirement is included in the QA Program, paragraph 3 (Section 4.3.1 of ANSI/ANS 3.2-1988).
9. TS 6.5.1.6.e - This requirement is included in the QA Program, paragraph 3 (Section 4.3.1 of ANSI/ANS 3.2-1988). Notification of the Senior Vice President, Production and Engineering, and the Chairman, NSARB is encompassed by paragraph 7 in the QA Program.
10. TS 6.5.1.6.f - This requirement is included in paragraph 1. of the QA Program.
11. TS 6.5.1.6.g - This requirement is included in paragraph 2. of the QA Program. Figure 2.6 of the QA Program also shows that PORC is overseen by NSARB.
12. \*TS 6.5.1.6.h - Independent review of the Plant Security Plan is required by 10 CFR 50.54(p)(3) and 10 CFR 73.55(g)(4) and does not need to be separately identified in the QA Program consistent with Generic Letter 93-07.
13. \*TS 6.5.1.6.i - Independent review of the Radiation Emergency Plan is required by 10 CFR 50.54(t) and does not need to be separately identified in the QA Program consistent with Generic Letter 93-07.
14. \*TS 6.5.1.6.j - This requirement is included in Section 6 of the QA Program under the scope of procedure changes. The periodic review of implementing procedures is addressed within plant procedures. The process described under item 7 above would encompass this requirement.
15. TS 6.5.1.6.k - This requirement is included in the QA Program, paragraph 3 (Section 4.3.1 of ANSI/ANS 3.2-1988).
16. \*TS 6.5.1.6.l - Periodic review of the Fire Protection Program and implementing procedures is required by the QA Program Table 18-1, Audit List. Reviews of fire protection procedure changes are performed in conjunction with the process of plant procedure change review as discussed under item 7 above. As defined by the Fire Protection Program, changes to the Program having safety significance require a written safety evaluation under 10CFR50.59 and would therefore receive PORC review consistent with ANSI/ANS 3.2-1988, Section 4.3.1. The QA Program paragraph 6. and 7. require that safety evaluations be forwarded to the Chairman, NSARB.

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17. TS 6.5.1.7 - This requirement is included in the QA Program in paragraph 6.
18. TS 6.5.1.8 - This requirement is included in the QA Program in paragraph 3 and 7.
19. TS 6.5.2.1 - The functional areas required for NSARB review and audit are described in the QA Program, paragraph 8. (ANSI/ANS 3.1-1987, Section 4.7).
20. \*TS 6.5.2.2 - The requirements are included in the QA Program, paragraph 8., with the exception that the requirement for at least one qualified non-company affiliated technical consultant (TS 6.5.2.2.c) is not included. ANSI N18.7-1976, Section 4.3.2.1 requires no less than 5 persons with no more than a minority from the onsite operating organization and does not require a non-company affiliated consultant. ANSI/ANS 3.1-1987, Section 4.7 states that "if sufficient expertise is not available from within the owner organization, independent reviews shall be supplemented by use of outside consultants or other qualified organizations." Since the functional areas in which the NSARB must be competent has not been reduced, this change is not a reduction in safety. The need for an outside consultant is a previous Standard Technical Specification requirement which has since been deleted as owner organizations have gained experience and expertise.
21. \*TS 6.5.2.3 - A limit on the number of alternates participating in NSARB activities is not specified in Section 4.3.2.1 of N18.7-1976. Since the functional areas in which NSARB must contain competence has not been reduced, and the ANSI Standard restricts the use of alternates to "legitimate absences of principles", this change is not a reduction in safety.
22. TS 6.5.2.4 - The qualification requirements of NSARB members is included in the QA Program, paragraph 8. Qualifications of members meet ANSI/ANS 3.1-1987, Section 4.7 except as noted for the functional areas of nuclear power plant operations and nuclear engineering. The QA Program requires 8 years experience for these functional areas, which is consistent with the existing Technical Specification 6.5.2.4.a. and 6.5.2.4.b. For all other functional areas, the QA Program is consistent with the existing Technical Specifications. Therefore, there is no reduction in the level of detail or qualifications for NSARB members in the QA Program as compared to the existing Technical Specifications.



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23. TS 6.5.2.5 - This requirement is included in the QA Program, paragraph 8 (N18.7-1976, Section 4.3.2.2.).
24. \*TS 6.5.2.6 - The QA Program, paragraph 8., is consistent with the existing Technical Specifications with the exception that a non-company affiliated technical consultant is not required in the quorum. Requiring this would not be consistent with the change made as discussed under item 20 above, since a non-company affiliated technical consultant is no longer a required member of NSARB. For the same reasons as in item 20, this change is not a reduction in the level of safety.
25. TS 6.5.2.7.a-h - These requirements are included in the QA Program paragraph 8. (N18.7-1976, Section 4.3.4).
26. \*TS 6.5.2.7.i - The requirement for NSARB to review the PORC meeting minutes is not specified in the scope of review under ANSI N18.7-1976. This requirement is also not contained in Improved Technical Specifications (i.e., NUREG-1431). Since the NSARB is required to review the same items related to nuclear safety as the PORC in ANSI N18.7-1976, elimination of this requirement is not a reduction in safety. The PORC does submit meeting minutes to the Senior Vice President Production and Engineering and the Chairman, NSARB for information as stated in the QA Program, paragraph 7.
27. \*TS 6.5.2.8 - These Technical Specifications are discussed under synopsis of changes for Section 18 and are also covered in the QA Program paragraph 8.
28. TS 6.5.2.9 - This requirement is included in the QA Program under responsibilities of Senior Vice President, Production & Engineering.
29. TS 6.5.2.10 - The record requirements of NSARB activities are included in the QA Program, paragraph 9.
30. TS 6.5.2.11 - Section 6 of the QA Program requires procedures for each department responsible for an activity. Procedures governing NSARB activities currently exist. This is also addressed in ANSI N18.7-1972, Section 4.2.1.

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The specific reference to Section 6.0 of the Technical Specifications was also deleted and replaced with "Administrative Controls section" to support expected near-term technical specification changes which will renumber most sections. This change provides equivalent reference to the location of Plant Manager responsibilities as delineated within Technical Specifications.

The above changes to section 2 require NRC approval prior to being implemented.

Another change to the organization reassigns records management and document control activities from the Technical Services Division to Quality Performance Department. (see Section 17)

### Section 3 Design Control

The reference to review of plant modifications by the onsite and offsite review groups as required by Technical Specifications 6.5.1.6 and 6.5.2.7 is deleted. The changes to Section 2 which inserted a reference to ANSI N18.7-1976 and ANSI/ANS 3.2-1988 adequately addresses the review of significant proposed plant changes as part of the review responsibility. This requires NRC approval prior to implementation.

### Section 5 Instructions, Procedures, and Drawings

References to Revision 2 of NRC Regulatory Guide 1.33, Appendix A was added to support the License Amendment Request (LAR) related to reformatting the Administrative Controls Section of Technical Specifications. This LAR proposes to use Revision 2 of Appendix A to Regulatory Guide 1.33 instead of Revision 0 (Technical Specification 6.8.1.a). Revision 2 is a NRC staff endorsed document. This change requires NRC approval prior to implementation.

### Section 6 Document Control

Requirements for the review and approval process and temporary change process for plant procedures have been clarified with reference to the guidelines of ANSI N18.7-1972, Sections 5.4 and 5.5. Review of plant procedures is performed as described under item 7 of Section 2 above. For temporary changes to procedures, the QA Program includes the same requirements as currently in Technical Specification 6.8.3. Since the designated independent and qualified reviewer meets the equivalent qualifications of a PORC member, that individual constitutes one of the "two members of plant management staff" referred to in TS 6.8.3.b. The Shift Supervisor is the second member. Therefore, this change does not result in a reduction in safety. ANSI N18.7-1972 further states

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that each procedure shall be reviewed and approved prior to initial use and retains the provisions for further review of procedures having safety-significance for any unreviewed safety question. The implementation of these requirements are delineated in plant procedures. This change requires NRC approval prior to implementation.

Document Control responsibilities have been reassigned from the Technical Services Division to the Ginna Nuclear Production Division.

#### Section 11 Test Control

The specific reference to Section 4.0 of the Technical Specifications was deleted to support expected near-term technical specification changes which will renumber most sections. The removal of this specific reference is acceptable since the requirement for a Ginna Station surveillance test program "as required by Technical Specifications" provides sufficient guidance without reducing any commitment.

The requirement for the PORC to review test procedures, and for the Plant Manager to approve the test procedures was deleted consistent with the basis for changes to Section 6 as presented above and recognition that this section includes reviews of test procedure by responsible technical personnel. Quality Performance review was deleted from this section as it is redundant to a Section 2 responsibility for the Nuclear Assurance sub-section.

#### Section 17 Quality Assurance Records

A reference to maintaining plant operating records as required in Section 6.10 of Technical Specifications is being deleted from both this section and Technical Specifications.

The existing record retention commitment to ANSI N45.2.9 as listed in Section 1 (i.e., Regulatory Guide 1.88) provides equivalent requirements. A reference to ANSI N45.2.9 is inserted in this section for clarification of the Ginna Station record extent. In addition, 10 CFR 20, Sub-part L, and 10 CFR 50.71 require the retention of certain records related to the operation of the nuclear plant.

The records management responsibilities have been reassigned from the Technical Services Division to the Quality Performance Department.

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#### Section 18 Audits

This section relocates from Technical Specification Section 6.5.2.8, to QA Program Table 18.1, the specific listing of required audits, not clearly addressed elsewhere, and their frequency. Audit requirements are necessary to satisfy 10 CFR 50, Appendix B, Criterion XVIII. The relocation of the audit requirements from the technical specifications does not result in a reduction in any commitment since changes to the QA Program are controlled by 10 CFR 50.54. All audit requirements currently contained in Section 6.5.2.8 of Technical Specifications are listed in Table 18.1 except for the following:

1. TS 6.5.2.8.e - Audit of the Radiation Emergency Plan is required by 10 CFR 50.54(t). Consistent with Generic Letter 93-07, frequency and unique requirements are described in the Radiation Emergency Plan. Section 18 makes reference to this audit.
2. TS 6.5.2.8.f - Audit of the Station Security Plan is required by 10 CFR 50.54(p)(3), 10 CFR 73.56 (g)(2) and 10 CFR 73.55(g)(4). Consistent with Generic Letter 93-07, frequency and unique audit requirements are described in the Security Plan. Section 18 makes reference to this audit.
3. TS 6.5.2.8.m - Audits of other facility operations considered appropriate by NSARB or the Senior Vice President, Production and Engineering is no longer specifically identified. As shown on Figure 2-1, NSARB and Quality Performance reports to the Senior Vice President, Production and Engineering. Figure 2-6 also shows that Quality Performance reports to NSARB regarding audit activities. Since a section of Quality Performance (i.e., Quality Assurance) performs all audits, there is sufficient authority to request additional audits as deemed necessary. Also, ANSI N18.7-1976, Section 4.3.4, item (5) allows NSARB to review "any matter involving safe operation of the nuclear power plant".

These changes require NRC approval prior to implementation.



