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SUBJECT: Forwards rev 21 to QA program for station operation.

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ROBERT C. MECREDY
Vice President
Ginna Nuclear Production

December 21, 1994

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

ATTN: Mr. Allen R. Johnson
Project Directorate I-3

SUBJECT: Revised Submittal of Quality Assurance Program for
Station Operation (Revision 21)
R. E. Ginna Nuclear Power Plant
Docket Number 50-244

Dear Mr. Johnson:

In accordance with 10 CFR 50.54(a)(3), enclosed is revision 21 to the Quality Assurance Program for Station Operation. The program has been reformatted to follow the format of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants", Section 17.3. The reformatting results in less detail in the text than was found in Revision 20. However, the basic commitments to the Regulatory Guides made in Revision 21 are the same as those made in Revision 20.

The utilization of the SRP Section 17.3 structure provides a standardized organization outline to support more efficient review and to facilitate ease of potential future enhancements. As noted in NRC Inspection Report 50-244/94-22, on September 28, 1994, RG&E management met with NRC staff. At that time the proposed revision to the Quality Assurance Plan was discussed including the licensing basis and potential initiatives for inclusion. Some of the key aspects associated with this change are:

- QA reporting responsibility reassigned to the Vice-President, Nuclear Operations.

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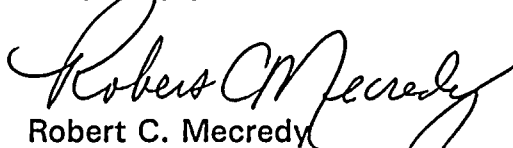
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- QA Manual being phased out following implementation of Nuclear Directives in a Nuclear Policy Manual.
- Increasing the emphasis on the line organization's responsibility for self-instituted and self-assessed quality reviews.
- Adjusting assessment frequencies based on safety significance and the assessed area's performance.
- A performance-based approach is emphasized more than a compliance-based approach including recognition of assessment functions other than auditing.
- Elements of the N45.2 daughter standards not previously addressed are now more clearly described.

Since the reformatting resulted in a complete rewrite of the program, no revision bars are used to denote the changes. We request that upon NRC approval, the QA Program changes should be considered effective immediately and implemented concurrently.

We will be prepared to discuss the contents of this submittal with NRC at any time after the staff has had the opportunity to review the document. Please don't hesitate to contact us if we can provide any further clarifications.

Very truly yours,


Robert C. Mecredy

Enclosure: QA Program for Station Operation Revision 21

xc: U.S. Nuclear Regulatory Commission
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