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SUBJECT: Responds to 970124 RAI re revised submittal of QA Program
 for Station Operation. Clarification of change on page 19,
 provided.

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March 14, 1997

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Subject: Reply to a Request For Additional Information
Revised Submittal Of Quality Assurance Program
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

This letter is in response to your Request For Additional Information, dated January 24, 1997. The NRC had determined the need for additional information regarding our Revised Submittal of Quality Assurance Program For Station Operation (QAPSO), dated December 13, 1996. Revision 22 of the QAPSO specifically listed Regulatory Guide 1.33, Rev. 2, Position 5a as a commitment. Revision 23 of the QAPSO did not list Position 5a of the Regulatory Guide and this appeared to be a reduction in commitment.

The change on Page 19 of our submittal is not a reduction in commitment. However, the following explanation should have been included with the changes when submitted.

Regulatory Guide 1.33

This section was rewritten to clarify commitments to various standards and portions of standards. In particular, this section contained a conflict in which a standard was invoked and then taken exception to later.

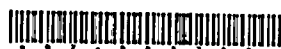
The second sentence of the remarks in Rev. 22 states "Ginna Station conforms to Regulatory Positions 1, 3 and 5a in RG 1.33 Rev. 2..."

NOTE: Position 5a invokes Section 4.4 of ANSI N18.7/ANS 3.2-1976.

The last sentence of the remarks in Rev. 22 states "Requirements for the onsite review function meet the

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guidelines of ANSI/ANS 3.2-1988, section 4.3 in lieu of ANSI N18.7-1976, section 4.4..."

This conflict in commitment to ANSI N18.7/ANS 3.2-1976, section 4.4 was removed by rewriting this section. Ginna is, and has been, conforming to ANSI/ANS 3.2-1988, Section 4.3 for review activities of the on-site review committee (PORC), as approved by NRC correspondence of February 2, 1995. This is consistent with the intent of Position 5a of RG 1.33, Rev. 2. This is also consistent with Page 8 of our Rev. 22 submittal which states "The PORC scope of review, organization, quorum, and records meet the requirements of ANSI/ANS 3.2-1988, Section 4.3."

Also, the use of ANSI/ANS 3.2-1988, section 4.3 in lieu of ANSI N18.7/ANS 3.2-1976, section 4.4 allows for the use of independent reviewers as described on Page 37 of our Rev. 22 submittal.

Therefore, the change in wording was intended to clarify the commitment and no reduction in commitment was intended or implemented.

Please note also, that there is a typo in our Rev. 23 submittal, in the last sentence of the remarks, in that we incorrectly referred to "ANSI N18.7-1988" which is actually "ANSI/ANS 3.2-1988". We will correct this error in our Rev. 24 submittal.

Very truly yours,


Robert C. Mecredy

xc: U.S. Nuclear Regulatory Commission
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