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 MECREDY,R.C.      Rochester Gas & Electric Corp.  
 RECIP.NAME      RECIPIENT AFFILIATION  
 VISSING,G.S.

SUBJECT: Forwards response to NRC 990217 RAI concerning changes  
 to QA program for RE Ginna Station operation.RG&E is  
 modifying changes requested in 981221 submittal.Modified  
 QA Program,encl.

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ROBERT C. MECREDY  
Vice President  
Nuclear Operations

March 1, 1999

U. S. Nuclear Regulatory Commission  
Document Control Desk  
ATTN: Mr. Guy S. Vissing  
Project Directorate I-1  
Washington, DC 20555

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

REFERENCES: a. Letter from R.C. Mecredy, RG&E, to G.S. Vissing,  
NRC, Subject: "Revised Submittal of Quality  
Assurance Program for Station Operation," dated  
December 21, 1998.

b. Letter from G.S. Vissing, NRC, to R.C. Mecredy,  
RG&E, Subject: "Revised Submittal of Quality  
Assurance Program for Station Operation, Request  
for Additional Information - R.E. Ginna Nuclear  
Power Plant (TAC No. MA4455)," dated February 17,  
1999.

Dear Mr. Vissing:

In Revision 26 of QA Program for Station Operations (Reference  
a), RG&E requested the following changes:

- Change commitment to Regulatory Guide 1.58, Rev. 1. An  
alternative to the use of SNT-TC-1A-1975 for the  
qualification and certification of nondestructive testing  
personnel is requested.
- Change commitment to Regulatory Guide 1.144, Rev. 1. In  
lieu of the 30 day requirement of Section 4.5.1 of ANSI  
N45.2.12-1977, an alternative is proposed.

On February 17, 1999, the NRC requested additional information  
concerning these changes in Reference b. RG&E is modifying the  
changes requested in Reference a and is providing the additional  
information requested.

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The modified changes are described in Attachment 1. Changes made to Revision 25 of the Quality Assurance Program for Station Operation are denoted by a single revision bar in the left margin in the Enclosure. Attachment 2 is a copy of the enclosure with changes highlighted or struck out.

Very truly yours,

  
Robert C. Mecredy

RCM\cjk\qapsorai.R26

Attachments 1 and 2

Enclosure: QA Program for Station Operation Revision 26

xc: U.S. Nuclear Regulatory Commission  
Mr. Guy S. Vissing (Mail Stop 14B2)  
Project Directorate I-1  
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Ginna Senior Resident Inspector

## ATTACHMENT 1

### 17.1 MANAGEMENT

#### Table 17.1.7-1 Conformance of Ginna Station Program to Quality Assurance Standards, Requirements and Guides

##### Regulatory Guide 1.58

##### RG&E Current Commitments

- RG&E commits to Reg. Guide 1.58, Rev. 1, which references SNT-TC-1A-1975 for the qualification and certification of nondestructive testing personnel
- RG&E's ISI Plan currently endorses ASME Code Section XI-1986 Edition. This edition of the ASME code references SNT-TC-1A-1980.

##### RG&E Requested Change

In Reference a, RG&E requested the following exception to the Reg. Guide 1.58, Rev. 1 commitment to eliminate the current conflicts in our commitments:

- RG&E's ISI Plan endorses ASME Code Section XI. The version of the ASME code endorsed is updated periodically. ASME Code Section XI references standards for the qualification and certification of nondestructive testing personnel. The standard referenced in the ASME code is used in lieu of SNT-TC-1A-1975, which is referenced by Reg. Guide 1.58, Rev. 1.

##### NRC Response

In Reference b, the NRC staff recommended a modification to RG&E's proposed text, as follows:

- "RG&E's ISI Plan endorses ASME Code Section XI. The version of the ASME code endorsed is updated periodically. ASME Code Section XI references standards for the qualification and certification of nondestructive testing personnel. Section XI of the ASME Code contains specific requirements for nondestructive examination and also references the use of other supplementary standards for the qualification and certification of personnel performing nondestructive examinations. The applicable versions of the standards referenced in Section XI of the ASME code, as permitted for use by 10 CFR Part 50.55a, may



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be used for the qualification and certification of personnel performing nondestructive examinations required by Section III and Section XI of the ASME Code in lieu of the standard identified in Reg. Guide 1.58, Rev. 1, (SNT-TC-1A-1975) provided that other applicable rules contained in Section XI of the ASME Code are met."

### RG&E Response

RG&E agrees with the NRC's modified text of our proposal. RG&E is incorporating this wording into Revision 26 of the QA Program for Station Operations.

## Regulatory Guide 1.144

### RG&E Current Commitment

RG&E is currently committed to Reg. Guide 1.144, Rev. 1, which endorses ANSI N45.2.12-1977. Section 4.5.1 of ANSI N45.2.12-1977 requires "In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for corrective action."

### RG&E Requested Change

In Reference a, RG&E requested that in lieu of the 30 day requirement of Section 4.5.1 of ANSI N45.2.12-1977 that the following be applied:

"The audited organization shall respond to audit findings prior to the requested date. In the event that corrective action can not be completed prior to the response due date, the audited organization's response shall include a scheduled date for completion of the corrective action."

### NRC Response

In reference b, the NRC staff expressed concerns relative to the processing and prioritization of significant audit findings.

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### RG&E Response

RG&E is modifying the requested change to address the concerns of the NRC staff. Audit findings that are determined to be significant conditions adverse to quality will be required to be responded to by the audited organization within 30 days. The modified change is as follows:

"Corrective action response due dates and priority shall be based on safety significance. For audit findings that are determined to be significant conditions adverse to quality, the audited organization's response shall be provided within 30 days. In the event that the corrective action for an audit finding cannot be completed by the response due date, the audited organization's response shall include a scheduled date for corrective action."