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SUBJECT: Forwards Rev 15 to "QA Program for Station Operation."

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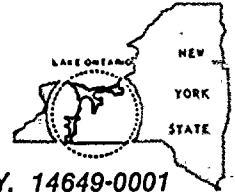
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December 28, 1989

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

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

Dear Mr. Johnson:

In accordance with 50.54 of 10CFR Part 50, enclosed is revision 15 to the Quality Assurance Program for Station Operation. The revision involves minor changes in the RG&E Management, Engineering and Ginna Station organizations. The realignment of the Materials Engineering and Inspection Services group from the Research and Science department to the Quality Assurance/Quality Control department organizations also recently occurred. Further details of these and other changes and related reasons are described in the following paragraphs.

Summary of Revision 15 Changes

Section 1 Quality Assurance Program

- Overall direction of quality assurance policy implementation changed from the President to the Senior Vice President, Production and Engineering as this re established position has been filled by an individual qualified to assume these responsibilities.
- Group title Quality Assurance/Quality Control renamed Quality Performance.
- Title of department head changed from the Director Quality Assurance/Quality Control to Department Manager Quality Performance concurrent with reorganizing the department.

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- Of those various implementing procedures, Research and Science procedures have been retitled as Materials Engineering and Inspection Services (MEIS) consistent with the realignment of MEIS from Research and Science and recognition that MEIS had the total responsibility for implementing the procedures.

Section 2 Organization

- Changed or added to the listing of positions responsible for the principle elements of the QA Program.
Senior Vice President, Production and Engineering (changed from Vice President)
Department Manager, Quality Performance (renamed from Director Quality Assurance/Quality Control)
- Changed who NSARB advises from Vice President to Senior Vice President Production and Engineering consistent with the title change of the officer.
- Position descriptions for the new and revised titles are included or revised to reflect the appropriate changes. The more significant among these is:
- The combining of those responsibilities previously assigned to the President and the Vice President, Production and Engineering into the responsibilities of the Senior Vice President Production and Engineering. Also the movement of Materials Engineering and Inspection Services from Research and Science to the newly formed Quality Performance Department along with Quality Assurance and Nuclear Assurance to consolidate similar responsibilities.
- The responsibilities of the Engineering Division Quality Services Coordinator position is revised to reflect a transfer of coordination responsibilities for Materials Engineering and Inspection Services to the Quality Performance Department. This is part of the consolidation efforts initiated with the establishment of the new Quality Performance Department.
- Changed on Figure 2-1, the title of Emergency Planner to Director, Corporate Radiation Protection. This new position will be directing the Corporate Nuclear Emergency Planner and the Corporate Health Physicist.
- Changed on Figure 2-3, the title Administrative Services Manager to the Manager, Materials Procurement and Budget consistent with the expanding procurement control programs at Ginna.
- Inserted on Figure 2-1, Senior Vice President, Gas & Electric Distribution and Corporate Planning between the Vice President, Electric Transmission and Distribution and President to correct an inadvertent previous omission.
- Deleted from Figure 2-1, Division Superintendent below the Vice President Electric Transmission and Distribution as the position was eliminated. Responsibilities for this position were assigned to others within the organization.

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- Clarified on Figure 2-1 those functions for which the Managers of Quality Assurance and Nuclear Assurance are responsible. Added to the Quality Assurance block describing functional responsibilities the QA surveillance function to augment the audit function.
- In Figure 2-2, changes to the Quality Performance organization included:
 - (1) Inclusion of Materials Engineering and Inspection Services (MEIS) Organization which was deleted from Figure 2-5. Placing MEIS in the same department as QA/QC is promoting improved relations with the line organizations immediately by association and over the long term as MEIS's excellent "customer service" orientation, permeates the whole department. There is also a natural, close functional association between QA/QC and MEIS in the areas of inspection, nondestructive examination, materials testing and dependence on effective quality programs for success.
 - (2) The Quality Control Foreman position has been re-established in the Nuclear Assurance organization.
 - (3) The Quality Performance Analyses and Program Support position has been established for creating analysis of quality performance and other support tasks associated with training coordination and maintenance of procedures.

Section 3 Design Control

No Change other than title changes from Quality Assurance/Quality Control and Quality Assurance to Quality Performance in the appropriate locations.

Section 4 Procurement Control

- The title of the organizations responsible for the review of procurement documents to determine adequacy of the quality requirements is changed from Quality Control and Quality Assurance to Quality Performance. This is to support consolidation of responsibilities in the new department.

Section 5 Instructions, Procedures and Drawings

- The title of the organizations responsible for reviewing and concurring with procedures written to implement the Quality Assurance Program is changed from Quality Assurance to Quality Performance. This is to support consolidation of responsibilities in the new department.



Section 6 Document Control

- Approval of the Quality Materials Engineering and Inspection Services Procedures Manual changed from Director Research and Science to the Manager, Materials Engineering and Inspection Services. This is consistent with the reassignment of Materials Engineering and Inspection Services to the Quality Performance Department.
- Approval of the Quality Assurance/Quality Control procedures elevated from the Manager, Quality Assurance to the Department Manager, Quality Performance. This is the approval level deemed appropriate for these procedures.

Section 7 Control of Purchased Material, Equipment and Services

- Allowance for multiple approved suppliers' lists. This is to support the establishment of a Commercial Grade Dedication program.
- Title changed from Quality Assurance/Quality Control to Quality Performance consistent with establishment of the new department.
- Research and Science changed to Materials Engineering and Inspection Services. This is consistent with the reassignment of Materials Engineering and Inspection Services to the Quality Performance Department.

Section 9 Control of Special Processes

- Title of Quality Assurance/Quality Control changed to Quality Performance.

Section 10 Inspection Control

- Changed responsibility for establishing the Inservice Inspection Program from the Director, Research and Science to the Manager, Materials Engineering and Inspection Services. This is consistent with the reassignment of Materials Engineering and Inspection Services, which is historically responsible for implementing this responsibility, to the Quality Performance Department.
- Changed responsibility for establishing the Inservice Pump and Valve Testing Program from Quality Assurance to Engineering. This is a result of the need for a separation of line and verification responsibilities identified during the IST Program upgrade.

Section 16 Correction Action

- Classified distribution of CAR summary reports changed from Senior Vice President, Production and Engineering and departmental supervision to departmental supervision only with Senior management notification of the more significant problems. The content of routine status reports in general, contains no information useful to Senior Management that they do not otherwise receive.



Section 18 Audits

- Distribution of audit reports to the Senior Vice President, Production and Engineering removed as he receives them as NSARB Chairman and related participation in an audit overview committee.
- Added requirements for controlling Quality Assurance Surveillances consistent with the establishment of the new program.

Table 1 -1 Tables of Departmental Implementing Procedures

- Revised to reflect the changes described for the 18 sections.

Table 18-1 Audit List

- List of activities audited at each department revised to reflect the changes described for the 18 sections.

Miscellaneous

- Where applicable in the various sections the Director, Quality Assurance/Quality Control title changed to Department Manager, Quality Performance.
- Where applicable in the various sections, Quality Assurance or Quality Control, changed to Quality Performance. This is to support consolidation of responsibilities in the new department.
- Typographical and editorial changes incorporated throughout the document where deemed appropriate.

All changes from previous revision 14 are identified with a vertical line in the left hand margin of each page. Each page will be identified as revision 15 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.

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 changes which have the Quality Performance department report to the Senior Vice President, Electric Production is consistent with the reporting relationship utilized prior to 1989 and suggested guidelines of ANS 3.2 regarding having access to responsible corporate management at a level where action appropriate to the mitigation of safety related quality assurance concerns can be accomplished.
- Recognition that the Materials Engineering and Inspection Services (MEIS) group performs independent quality verification services for the line organizations through the NDE and materials testing functions performed. For those services

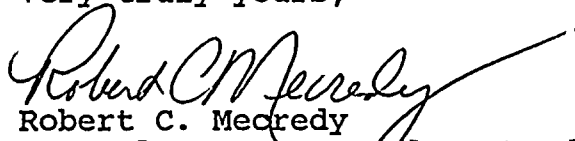


considered other than independent quality verification recognition that MEIS will function much the same as in the past with regard to independence from Quality Assurance and Quality Control groups. MEIS will be governed by their own procedures and be subjected to periodic audit and surveillance.

Recognition that the other changes of the Quality Performance organization result from organization enhancements adopted to support ongoing performance objectives.

Recognition that the other changes are largely descriptive of title changes and changes in terminology each of which is considered to have no impact on previous commitments.

Very truly yours,



Robert C. Meedredy
General Manager, Nuclear Production

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Enclosures

xc: C. Marschall, Senior Resident Inspector Region 1

