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 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Forwards Rev 20 to "QA Program for Station Operation,"
 incorporating QA related changes associated w/reformatting
 of Administrative Controls Section 6 of TS, in ref to 940513
 application for amend to license DPR-18.

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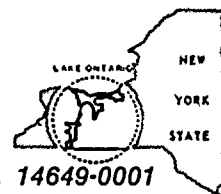
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May 16, 1994

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
R. E. Ginna Nuclear Power Plant
Docket Number 50-244

REFERENCE: a. 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

Dear Mr. Johnson:

In accordance with 10 CFR 50.54(a)(3), enclosed is revision 20 to the Quality Assurance Program for Station Operation. Revision 20 incorporates quality assurance related changes associated with the reformatting of the Administrative Controls Section 6 of Technical Specifications (Reference a.). These changes impact commitments in the quality assurance program description previously approved by the Nuclear Regulatory Commission (NRC) and therefore require NRC approval.

The changes 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 Quality Assurance 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.

- 1 -

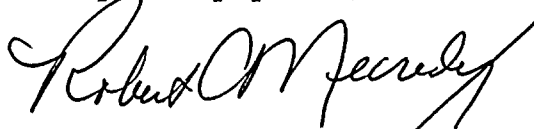
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We request that upon NRC approval, the QA Program changes should be considered effective immediately and implemented concurrent with implementation of the technical specification changes being requested in Reference a.

Very truly yours,



Robert C. Mecredy

RCM\bks\qap_sub.R20

Attachments 1 and 2

Enclosure: QA Program for Station Operation Revision 20

xc: U.S. Nuclear Regulatory Commission
Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
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

Synopsis of Changes

Section 1 Quality Assurance Program

References to NRC Regulatory Guide 1.33, Revision 2, Regulatory Positions 1, 3, 4, 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, 4, and 5a 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). 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 N18.7-1976, Section 4 is now provided for the onsite review function (i.e., the Plant Operations Review Committee) and the offsite review and audit function (i.e., the Nuclear Safety Audit and Review Board). This ANSI standard is a NRC staff endorsed document which provides equivalent or more conservative requirements than those currently listed in Technical Specifications (TS) except for the following:

- o TS 6.5.1.3 - The requirement for alternate members to be designated in writing by the PORC Chairman is not specified in ANSI N18.7-1976. The use of alternates will be documented in procedures which are approved and signed by the PORC Chairman which provides equivalent control.
- o TS 6.5.1.4 - The minimum meeting frequency of the PORC is not specified in ANSI N18.7-1976 (versus once per calendar month). The PORC remains responsible for reviewing all matters related to nuclear safety such that the committee will meet on a frequency necessary to perform these reviews.
- o TS 6.5.1.5 - The PORC quorum size is not specified in ANSI N18.7-1976. A statement documenting the quorum size has been added to the QA Program which is more conservative than the current Technical Specification requirement since it requires a majority of PORC members.
- o 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.

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Synopsis of Changes

- o 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.
- o TS 6.5.2.2.a and .e - The appointment of the NSARB Chairman and members by the RG&E Chairman of the Board, President, and Chief Executive Officer is not provided in ANSI N18.7-1976, but is discussed in Section 2 of the QA Program under the responsibilities of the Chairman of the Board.
- o TS 6.5.2.2.b and .d - The minimum number of NSARB members is changed from 7 to 5 in ANSI N18.7-1976. Since the functional areas which NSARB must contain competence in has not been reduced, this change is not a reduction in safety.
- o TS 6.5.2.2.c - An outside consultant is not required by ANSI N18.7-1976 unless sufficient expertise is not available from within the owner organization. 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. Section 4.3.1 of ANSI N18.7-1976 requires that "appropriate expertise is brought to bear in reviews of operational activities". Therefore, the elimination of an offsite consultant is addressed by the requirement for sufficient expertise for all reviews.
- o TS 6.5.2.3 - A limit on the number of alternates participating in NSARB activities is not specified in ANSI N18.7-1976. Since the functional areas which NSARB must contain competence in 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.
- o TS 6.5.2.4 - The NSARB member qualifications are not specified in ANSI N18.7-1976. Since the functional areas which NSARB must contain competence in has not been reduced, this change is not a reduction in safety.
- o TS 6.5.2.7.i - The requirement for NSARB to review the PORC meeting minutes is not specified in ANSI N18.7-1976. This requirement is also not contained in Standard 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.

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Synopsis of Changes

- o TS 6.5.2.10 - NSARB record requirements related to the time period for submitting reports is not specified in ANSI N18.7-1976. The time requirements and report recipients are contained in procedures which document NSARB activities as discussed in Section 4.2 of ANSI N18.7-1976.

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.

Reference to responsibilities for items in accordance with 6.0 Technical Specifications was deleted from the Senior Vice President, Production and Engineering responsibility section. These deletions involve details on reviewing PORC minutes and other reports forwarded from PORC involving disagreements and non-reportable violations to Technical Specifications. Procedures will continue to specify distribution guidelines of reports and minutes to positions and groups having assigned oversight-responsibility as required by ANSI N18.7-1976, Section 4.2(6).

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 Ginna Nuclear Production Division.

Section 3 Design Control

The reference to review of plant modifications by the onsite and offsite review groups as required by Technical Specification 6.5 is deleted. The changes to Section 2 which inserted a reference to ANSI N18.7-1976 adequately addresses the review of significant proposed plant changes as part of the review responsibility but require 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.

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Synopsis of Changes

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. This clarification is necessary since the Plant Operations Review Committee responsibility for reviewing Ginna Station Procedures prior to their approval and changes thereto and for Plant Manager approval of such changes is being relocated from Technical Specifications (TS 6.8.2 and 6.8.3). The requirements for procedure control is mandated by 10 CFR 50, Appendix B, Criterion VI. Section 6 describes the requirements for the control and coordination of the review, approval and the issuance of documents, including changes thereto. ANSI N18.7-1972 further states 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.

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Synopsis of Changes

Section 17 Quality Assurance Records (cont'd.)

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 Ginna Nuclear Production Division.

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:

- o 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.
- o 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.
- o 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. ANSI N18.7-1976, Section 4.2, Item (3) requires written programs that contain "mechanisms for initiating audit and independent review activities". As shown on Figure 2-1, NSARB and Quality Performance reports to the Senior Vice President, Production and Engineering.

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Synopsis of Changes

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.