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JOHNSON,A.R. Project Directorate I-3

SUBJECT: Submits revised submittal of QA program for station operation.

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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001 AREA CODE 716 546-2700

ROBERT C. MECREDY
Vice President
Ginna Nuclear Production

September 23, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Revised Submittal of Quality Assurance Program for Station Operation
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References: a. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Revised Submittal of Quality Assurance Program for Station Operation," dated August 16, 1994.

b. 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,

A proposed revision 20 to the Quality Assurance (QA) Program for Station Operation was previously submitted to the Nuclear Regulatory Commission (NRC) by Reference (a). Subsequent to this submittal, a conference call was conducted between the NRC and Rochester Gas & Electric (RG&E) on September 21, 1994 at which time several changes of the proposed QA Program were requested. This submittal addresses all comments provided by the NRC during the conference call as summarized below:

a. The members of the PORC and the independent and qualified reviewer for procedure changes are now required to meet the qualifications of ANSI Standard N18.1-1971, Section 4.3.1 or 4.4 instead of Section 4.3 or 4.4. As a result of this change, PORC members and the independent reviewers must be either a supervisor with a license or a supervisor or technical support staff member which meets the qualifications provided in Section 4.4 of this ANSI Standard.

b. The PORC is required to review proposed changes to tests and experiments that may affect nuclear safety as currently provided in the Ginna Station Technical Specifications.

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In addition, this submittal also clarifies the qualifications of the Plant Operations Review (PORC) chairman. The proposed Revision 20 (Reference (a)) stated that the PORC chairman meets the qualifications of ANSI Standard N18.1-1971, Section 4.2.2. The qualifications as listed in this referenced ANSI Standard are for the Operations Manager and requires that at the time of appointment, the Operations Manager shall hold a Senior Reactor Operator's (SRO) License. The current PORC chairman does not hold a SRO's license, but did hold this license previously. Also, current licensing classes for plant staff result in participants obtaining certification and not a license. Therefore, additional clarification is being provided in the QA Program to require that the PORC chairman hold, or have held a SRO's license or certification. This clarification is not a reduction in commitment.

Only the pages affected by the above described changes are provided at this time. All other pages of Reference (a), including the Synopsis of Changes, remain unchanged.

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

Very truly yours,

Robert C. Mecredy

Attachments

MDF\644

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
PWR 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 to the August 16, 1994 Letter

Remove	Insert
11	11
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PORC

1. Review Activities of the PORC shall provide, as part of the normal duties of plant supervisory personnel, timely and continuing monitoring of operating activities to assist the Plant Manager in keeping abreast of general plant conditions and to verify that the day-to-day operating activities are conducted safely and in accordance with applicable administrative controls. PORC shall also review facility operations to detect potential safety hazards. These continuing monitoring activities are considered to be in integral part of the routine supervisory function and are important to the safety of plant operation.

2. The onsite operating organization shall perform reviews periodically and as situations demand, to evaluate plant operations and to plan future activities. The important elements of the reviews should be documented. The PORC shall screen subjects of potential concern to NSARB and perform preliminary investigations.

3. The PORC scope of review, organization, quorum, and records meet the requirements of ANSI/ANS-3.2-1988, Section 4.3. PORC is comprised of personnel who collectively have the experience and competence in the following areas:

   Nuclear Operations
   Mechanical Maintenance
   Electrical Maintenance
   Plant Engineering
   Reactor Engineering
   Radiation Safety
   Chemistry
   Quality Assurance/Quality Control

4. The PORC chairman meets the qualifications of ANSI Standard N18.1-1971, Section 4.2.2, and will hold, or have held, a Senior Operating License or certification. PORC members meet the qualifications of Section 4.3.1 or 4.4 as applicable. The PORC is comprised of a minimum of five (5) and maximum of nine (9) regular members as designated by the Plant Manager. Alternates are designated in writing by the chairman. The number of attending alternates will not exceed a minority of the number representing a quorum. The PORC meets at least once per calendar month and as convened by the PORC Chairman.

5. The PORC shall also review proposed tests and experiments and changes to procedures that may affect nuclear safety.

6. The PORC recommends in writing to the Plant Manager approval of items submitted for review, documents whether any change constitutes an unreviewed safety question under 10CFR50.59, and provides immediate notification to the Senior Vice President, Production and Engineering and the Chairman, NSARB of disagreement between the PORC and the Plant Manager.

7. The PORC provides written meeting minutes to the Senior Vice President, Production and Engineering and the Chairman, NSARB.

NSARB

8. The NSARB scope of review meets the requirements of ANSI Standard N18.7-1976, Section 4.3.4. The NSARB composition, meeting frequency, quorum, and record requirements meet ANSI Standard N18.7-1976, Section 4.3.2. Qualifications of members shall be commensurate with their functional responsibilities as defined in ANSI/ANS-3.1-1987, Section 4.7, with the exception that the functional areas of nuclear power plant operations and nuclear engineering have over eight (8) years experience in their field with over four (4) years responsible engineering management. The members of NSARB are appointed by the Chairman of the Board.

9. Records of NSARB activities are prepared, approved and distributed within 14 days to the Chairman of the Board and the Senior Vice President, Production and Engineering. Reports of reviews in the areas encompassed by Sections 4.3.4(4) and 4.3.4(5) of ANSI Standard N18.7-1976 are prepared, approved and forwarded to the Senior Vice President, Production and Engineering within 14 days from completion of the review. Audit reports encompassed by Table 18-1 are forwarded to the Senior Vice President, Production and Engineering, and the management positions responsible for the areas audited within 30 days after completion of the audit.

6. Document Control

Procedures are established to control the issuance of procedures, instructions, drawings, and specifications. Standard document control requirements are contained in the Quality Assurance Manual. The Plant Manager, Ginna Station is responsible for the control of all documents issued by Ginna Station personnel. Gas and Electric Distribution Division and Production Division Training are responsible for the control of documents issued by their respective organizations. Production and Engineering Systems controls the distribution of controlled manuals issued for the other organizations performing activities which implement this Quality Assurance Program (Table 1-1). Each organization controlling documents has a separate procedure to control documents in accordance with the requirements of the Quality Assurance Manual.

The Quality Assurance Manual designates responsibilities and defines requirements for the preparation, review and approval of documents. Each department responsible for an activity is responsible for providing the necessary review and approval of instructions, procedures or drawings to assure that they are adequate, and include appropriate qualitative and quantitative requirements. Nuclear Assurance Quality Control representatives, who are assigned to support departmental maintenance, repair, refueling and modification activities, are responsible for reviewing, prior to use, governing procedures to assure quality assurance requirements are included. Changes to procedures specified in the Administrative Controls Section of the Technical Specifications shall receive a technical review in accordance with ANSI/ANS 3.2-1988, Section 4.2. Changes will also be reviewed relative to their safety significance by an independent reviewer designated by the PORC Chairman or Plant Manager and subsequently approved by the Plant Manager or designee. Changes that may affect nuclear safety are referred to and subsequently reviewed by PORC. The qualifications of the designated reviewer are equivalent to those of regular PORC members and meet ANSI Standard N18.1-1971 Section 4.3.1 or 4.4 as applicable. Temporary changes to procedures that do not alter the intent of the procedure, in addition to the review process described above, are approved by the Shift Supervisor and subsequently approved by the Plant Manager or designee within 10 days of implementation. Requirements for the pre-approval review of Ginna Station procedures and the temporary change process are consistent with the guidelines of ANSI N18.7-1972

Sections 5.4 and 5.5. ~~The Plant Operations Review Committee has the responsibility for reviewing Ginna Station procedures prior to their approval as required by Section 6.0, Technical Specifications.~~ Detailed inspection, test and examination procedures used by qualified personnel require the review and concurrence of the responsible technical person associated with that activity. Ginna Station, Nuclear Engineering Services, Material Engineering and Inspection Services, Purchasing, Production Division Training and Gas and Electric Distribution Division quality assurance implementing procedures (Table 1-1) require the review of Quality Performance and the approval of the appropriate department supervisor.

Quality Assurance/Quality Control procedures are approved by the Department Manager, Quality Performance or designee.

The Quality Assurance Manual requires that documents be controlled as appropriate, considering the type of document involved, its importance to safety, and the intended use of the document. It identifies the difference between controlled and uncontrolled copies of the same document; includes the method for identifying holders of controlled copies; requires that only controlled copies of a document be used for official purposes; requires that lists of effective revisions be issued periodically; requires lists of document holders to be maintained by the distributors; and requires that distributors transmit controlled documents using approved forms internally and externally.

Types of documents which are controlled include Technical Specifications, UFSAR, Quality Assurance Manual, procedures (such as engineering, purchasing, repair, maintenance, test, calibration, fuel handling, modification, and administrative), specifications and drawings. Suppliers of materials, equipment, and services under an approved 10CFR50 Appendix B supplier quality assurance program are required in procurement documents to provide for control of documents, including manufacturing, inspection and testing instructions.

The Quality Assurance Manual further requires that each organization provide in its procedures for measures: to assure that documents are available when required; to properly review and approve documents such as procedures, instructions, specifications and drawings to provide the same reviews and approvals for changes to documents as was required of the original document; to require that organiza-

Attachment 2 to the August 16, 1994 Letter

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The onsite operating organization shall perform reviews periodically and as situations demand, to evaluate plant operations and to plan future activities. The important elements of the reviews should be documented. The PORC shall screen subjects of potential concern to NSARB and perform preliminary investigations.

The PORC scope of review, organization, quorum, and records meet the requirements of ANSI/ANS-3.2-1988, Section 4.3. PORC is comprised of personnel who collectively have the experience and competence in the following areas:

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Electrical Maintenance
Plant Engineering
Reactor Engineering
Radiation Safety
Chemistry
Quality Assurance/Quality Control

The PORC chairman meets the qualifications of ANSI Standard N18.1-1971, Section 4.2.2, and will hold, or have held, a Senior Operating License or certification. PORC members meet the qualifications of Section 4.3.1 or 4.4 as applicable. The PORC is comprised of a minimum of five (5) and maximum of nine (9) regular members as designated by the Plant Manager. Alternates are designated in writing by the chairman. The number of attending alternates will not exceed a minority of the number representing a quorum. The PORC meets at least once per calendar month and as convened by the PORC Chairman.

The PORC shall also review proposed tests and experiments and changes to procedures that may affect nuclear safety.

The PORC recommends in writing to the Plant Manager approval of items submitted for review, documents whether any change constitutes an unreviewed safety question under 10CFR50.59, and provides immediate notification to the Senior Vice President, Production and Engineering and the Chairman, NSARB of disagreement between the PORC and the Plant Manager.

The PORC provides written meeting minutes to the Senior Vice President, Production and Engineering and the Chairman, NSARB.

Plant Manager and subsequently approved by the Plant Manager or designee. Changes that may affect nuclear safety are referred to and subsequently reviewed by PORC. The qualifications of the designated reviewer are equivalent to those of regular PORC members and meet ANSI Standard N18.1-1971 Section 4.3.1 or 4.4 as applicable. Temporary changes to procedures that do not alter the intent of the procedure, in addition to the review process described above, are approved by the Shift Supervisor and subsequently approved by the Plant Manager or designee within 10 days of implementation. Requirements for the pre-approval review of Ginna Station procedures and the temporary change process are consistent with the guidelines of ANSI N18.7-1972 Sections 5.4 and 5.5. Detailed inspection, test and examination procedures used by qualified personnel require the review and concurrence of the responsible technical person associated with that activity. Ginna Station, Nuclear Engineering Services, Material Engineering and Inspection Services, Purchasing, Production Division Training and Gas and Electric Distribution Division quality assurance implementing procedures (Table 1-1) require the review of Quality Performance and the approval of the appropriate department supervisor.

Quality Assurance/Quality Control procedures are approved by the Department Manager, Quality Performance or designee.

The Quality Assurance Manual requires that documents be controlled as appropriate, considering the type of document involved, its importance to safety, and the intended use of the document. It identifies the difference between controlled and uncontrolled copies of the same document; includes the method for identifying holders of controlled copies; requires that only controlled copies of a document be used for official purposes; requires that lists of effective revisions be issued periodically; requires lists of document holders to be maintained by the distributors; and requires that distributors transmit controlled documents using approved forms internally and externally.

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