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RECIP.NAME RECIPIENT AFFILIATION
VISSING,G.S.

See Reports

SUBJECT: Forwards Rev 26 to "QA Program for Station Operation," in accordance with 10CFR50.54(a)(3).Rev 26 incorporates organization related changes associated with reorganization of Nuclear Operations Group & clarification of methods.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 21, 1998

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

Dear Mr. Vissing:

In accordance with 10 CFR 50.54(a)(3), enclosed is Revision 26 to the Quality Assurance Program for Station Operation. Revision 26 incorporates the following changes:

- Organization related changes associated with the reorganization of the Nuclear Operations Group.
- Clarification of methods used to control supplier performance.

The above changes do not impact commitments in the Quality Assurance Program description previously approved by the Nuclear Regulatory Commission (NRC) and therefore do not require NRC prior approval. These Quality Assurance Program changes have already been incorporated into station directives and procedures.

Additionally, Revision 26 of QA Program for Station Operations incorporates 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 1.88, Rev. 2 which incorporates ANSI N45.2.9-1974. The use of alternative facilities to requirements of Section 5.6 (Facility) of ANSI N45.2.9-1974 are 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.

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- Change commitment to Regulatory Guide 1.146, Rev. 0. A alternative is proposed to Section 2.3.4 of ANSI N45.2.23-1978 for certification of prospective lead auditors.

- Revise Audit Topic Areas listed in Table 17.3.2-1. The use of the word "all" is being deleted from the audit descriptions for items a, c and d.

The above changes impact the commitments (Reduction in Commitment) in the Quality Assurance Program description previously approved by the NRC, and therefore require NRC approval prior to implementation.

All of 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. Changes made to Revision 25 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.

Very truly yours,

Robert C. Mecredy

RCM\cjk\qap_sub.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

Organization Changes

The following organization changes were made and are reflected throughout the text of the document and on the Figure 17.1.2-1 Organization Chart:

- The Department Manager, Nuclear Training now reports to the Vice President, Nuclear Operations Group. Additionally, the responsibility for Nuclear Emergency Preparedness was transferred from the Department Manager, Nuclear Assessment to the Department Manager, Nuclear Training.

- The positions of Director, Operating Experience and Manager, Nuclear Assurance have been eliminated. The responsibilities for these positions have been assumed by the newly created position of Manager, Operational Review.

- The responsibility for the fire protection program has been transferred from the Department Manager, Nuclear Engineering Services to the Plant Manager, Ginna Station.

- Nuclear Engineering Services reorganized internally. This change affected the Figure 17.1.2-1 Organization Chart only.

These changes are reflected throughout the revised document and are not identified at each occurrence in the following summary of changes.

17.1 MANAGEMENT

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

Regulatory Guide 1.58

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.

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Requested Change

RG&E is requesting the following exception to the Reg. Guide 1.58, Rev. 1 commitment to eliminate the current conflicts in our commitments 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. 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.

Justification for Change

This change is being made to eliminate the current conflict and prevent future conflicts in our commitments.

A review was performed of the difference between the 1975 and 1980 editions of SNT-TC-1A. One issue was identified:

- The number of initial training hours for personnel with a grammar school education in the 1975 edition are greater than those required by the 1980 edition. However, this difference is not considered significant.

Since these versions of SNT-TC-1A do not significantly differ, this change does not reduce the scope of the Quality Assurance Program.

Regulatory Guide 1.88

Current Commitment

RG&E is currently committed to Reg. Guide 1.88, which endorses ANSI N45.2.9-1974. Section 5.6 of ANSI N45.2.9-1974 mandates the use of a four hour fire rated facility for non-duplicated records.

ATTACHMENT 1

Requested Change

RG&E is requesting that the requirements in Section 5.6 (Facility) of ANSI N45.2.9-1974 be supplemented by the following alternatives:

- Records may be stored in a 2-hour rated facility meeting the requirements described in QAPSO Section 17.2.15.

- Records may be stored temporarily in 1-hour fire rated cabinets provided that the requirements of QAPSO Section 17.2.15 are met.

These alternatives are not allowed by our current commitment.

Justification for Change

NFPA 232 2-Hour Rated Protection

The requirements contained in QAPSO Section 17.2.15 for alternate records storage facilities are consistent with the guidance provided by the NRC NUREG-0800 Chapter 17.1 QA During the Design and Construction Phases. Section 17.4 of this chapter under Quality Assurance Records 17.1.17 describes the use of 2 hour rated records storage facilities meeting NFPA 232 requirements. Based on this NRC endorsement of the use of alternate single facilities for the storage of records, this change should be considered acceptable. This change does not reduce the scope of the Quality Assurance Program.

Temporary Storage of Records

The use of temporary storage is requested to allow the use of one-hour fire rated cabinets to store records that are awaiting processing for permanent storage (i.e. duplication or transfer to a single facility). The storage of these records in one-hour rated cabinets will be controlled by procedures which specify a maximum allowable time limit.

The records processing room in which the one-hour fire rated containers are stored is protected by sprinklers. The use of sprinklers in this room would limit the spread of a potential fire, and provides additional protection to the records stored in the cabinets. Therefore, the records stored in these cabinets are

effectively provided greater than one-hour rated protection. Since this protection provides reasonable assurance that the records will not be lost or damaged, this change does not reduce the scope of the Quality Assurance Program.

Regulatory Guide 1.144

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."

Requested Change

In lieu of the 30 day requirement of Section 4.5.1 of ANSI N45.2.12-1977 the following is proposed: 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.

Justification for Change

Ginna uses a single point corrective action process. This process is used to identify all items requiring corrective action at Ginna Station, including audit findings. During the initial review of each item requiring corrective action, a priority is assigned based on its significance.

The current 30 day requirement for audit findings, however, results in audit findings receiving a high level priority regardless of their significance. The proposed change will allow audit findings to be prioritized using the same process as other items.

Since the prioritization process used in the corrective action process is acceptable for items identified by other plant personnel, it should be considered acceptable for the prioritization of findings identified by audit personnel. This process will support meeting 10CFR50, Appendix B Criterion II expectations that activities affecting quality be accomplished using controls consistent with their importance to safety. This change does not reduce the scope of the Quality Assurance Program.

ATTACHMENT 1

Regulatory Guide 1.146

Current Commitment

RG&E is currently committed to Reg. Guide 1.146, Rev. 0, which endorses ANSI N45.2.23-1978. Section 2.3.4 of ANSI N45.2.23-1978 requires that prospective lead auditors participate in a minimum of five QA audits within a 3 year period prior to qualification.

Requested Change

In lieu of the requirements of 2.3.4 of ANSI N45.2.23-1978 the following change is requested:

"Prospective lead auditors shall demonstrate their ability to effectively implement the audit process and effectively lead an audit team. RG&E will describe this demonstration process in written procedures and shall evaluate and document the results of the demonstration. Regardless of the methods used for the demonstration, the prospective lead auditor shall have participated in at least one nuclear quality assurance audit within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI N45.2.23-1978, the individual may be certified as being qualified to lead audits."

Justification for Change

The revised requirements for certification of lead auditors are consistent with the guidance provided by the NRC in a letter titled "Review of Nuclear Energy Institute Proposed Improvements to QA Programs", dated October 24, 1996. The revised requirement meets the intent of Section 2.3.4 of ANSI N45.2.23-1978 to have the prospective lead auditor demonstrate the ability to effectively implement the audit process and to lead an audit team.

Since the revised requirements meet the intent of the original requirement and the NRC has proposed this approach as an acceptable alternative, this change does not reduce the scope of the Quality Assurance Program.

17.2 PERFORMANCE/VERIFICATION

17.2.4 Procurement Control

Text under "Control of Supplier Performance" was changed to read:

Control of supplier performance shall include:

- Monitoring supplier activities through audits and surveillances.
- Evaluation by requesting submittal of supplier documents for review.
- Identifying under what conditions suppliers are to report nonconformances.

The existing paragraph in the QAPSO could not be easily interpreted by the plant staff. Through a review of previous revisions of the QAPSO, the purpose and intent of this paragraph was confirmed. This paragraph was rewritten to provide clarification. This change is not considered a reduction in commitment.

17.2.15 Records

The records section was revised to provide detailed implementation of the revised Reg. Guide 1.88 commitment. Justification for this change is described in the change to Table 17.1.7-1, Conformance of Ginna Station Program to Quality Assurance Standards, Requirements and Guides.

ATTACHMENT 1

17.3 ASSESSMENT

Table 17.3.2-1, Audit List

Requested Change

The following line items were revised as follows:

a. The conformance of facility operation to ~~all~~ provisions contained within the Technical Specifications and applicable license conditions.

c. The results of ~~all~~ actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety.

d. The performance of ~~all~~ activities required by the Quality Assurance Program to meet the criteria of 10CFR50, Appendix B.

Justification for Change

The word "all" as used in these audit descriptions implies an excessive requirement. The existing wording could be interpreted to mean that:

a. ALL Technical Specification provisions are audited every 24 months. This would include a verification of each and every surveillance test, LCO etc.

c. ALL action taken to correct deficiencies are audited every 24 months. This would include a review of each and every ACTION Report affecting safety-related items and the corrective action taken.

d. ALL activities required by the QA Program. This would include a verification of each and every safety-related work order, purchase order, calibration, procedure change, test, inspection, design change etc.

ANSI N45.2.12-1977 Section 4.3.2.3 states "Selected elements of the quality assurance program shall be audited to the depth necessary to determine whether or not they are being implemented effectively".

Ginna uses a sampling approach to meet this requirement, rather than a review of every safety-related activity. It is not necessary to perform a 100% review of activities to determine the effectiveness of the implementation of the program being audited. This approach has been proven effective throughout the life of the plant.

The revised program, as described above, continues to satisfy the 10CFR50, Appendix B criteria and does not reduce the scope of the Quality Assurance Program.

Attachment 2

ROCHESTER GAS AND ELECTRIC CORPORATION

R.E. GINNA NUCLEAR POWER PLANT

Quality Assurance Program for Station Operation

Revision 26

DOCKET NO. 50-244

December 21, 1998

The Nuclear Policy Manual provides a method of applying a graded QA Program to systems, components, items, and services which are not classified as safety related (SR), but are considered necessary for reliable plant operation.

Special terms used in this document which are not found in ANSI N45.2.10 "Quality Assurance Terms and Definitions" are defined in Table 17.1.1-2, Supplementary Glossary.

17.1.2 Organization

The major organizations participating in the Quality Assurance Program fall within the Generation unit, under the leadership of the Senior Vice President, Generation. They are:

- Nuclear Operations - including Ginna Station, Nuclear Engineering Services, Nuclear Assessment, Nuclear Training, and the Plant Operations Review Committee
- Nuclear Safety Audit and Review Board (NSARB)

Under the Corporate Services Unit, the following organizations participate in the QA Program:

- Information Services
- Support Services - including Strategic Supply Management, Laboratory and Inspection Services, Physical Services, and Technical Services.

Additionally, the Energy Delivery Group provides support for the QA Program.

Figure 17.1.2-1 is an organization chart showing these organizations and their relationship to the corporate organization. Chapter 13 of the UFSAR augments the Figure with organization charts for the various departments.

Positions responsible for the principal elements of the quality assurance program are:

- Chairman of the Board, President, and Chief Executive Officer
- Senior Vice-President - Corporate Services
- Senior Vice President, Generation
- Vice President, Nuclear Operations Group
  - Plant Manager, Ginna Station
  - Department Manager, Nuclear Engineering Services
  - Department Manager, Nuclear Assessment
  - Manager, Quality Assurance
  - Manager, Operational Review~~Nuclear Assurance~~
  - ~~Director, Operating Experience~~
  - Department Manager, Nuclear Training

- Group Manager, Support Services
- Group Manager, Energy Delivery
- Group Manager, Information Services

SENIOR MANAGEMENT

Chairman of the Board, President, and Chief Executive Officer

The Chairman of the Board, President, and Chief Executive Officer of the Rochester Gas and Electric Corporation directed the establishment of the Quality Assurance Program and issued the governing policy statement. He established the Nuclear Safety Audit and Review Board to review and audit plant operations. The Chairman of the NSARB is responsible to the Chairman of the Board, President, and Chief Executive Officer on all activities of the NSARB.

Senior Vice President, Generation

The Senior Vice President, Generation reports to the Chairman of the Board, President and Chief Executive Officer. He oversees all organizations involved in the operation and support of Ginna Station, including the Quality Assurance Program. He is also responsible for those items delineated in the Administrative Controls section of the Technical Specifications.

Senior Vice President, Corporate Services

The Senior Vice President, Corporate Services reports to the Chairman of the Board, President and Chief Executive Officer and oversees Support Services' and Information Services' activities supporting Ginna Station.

NUCLEAR OPERATIONS

Vice President, Nuclear Operations Group

The Vice President, Nuclear Operations Group is responsible to the Senior Vice President, Generation and has corporate responsibility for operation of Ginna Station in accordance with applicable regulatory requirements. In addition, he has overall responsibility and authority for directing the Quality Assurance Program and is responsible for the approval of the Nuclear Policy Manual. He is responsible for establishing the policies and requirements necessary to assure safe and reliable operation of Ginna Station and for oversight of Ginna Station and those support activities associated with Nuclear Engineering Services, Nuclear Assessment, and Nuclear Training.

Plant Manager, Ginna Station

The Plant Manager, Ginna Station is responsible to the Vice President, Nuclear Operations Group for the overall on-site safe operation of Ginna Station. He is responsible for:

- the performance of all Ginna Station quality affecting activities in accordance with the requirements of the Quality Assurance Program
- providing ~~trained and~~ qualified personnel to perform quality affecting activities in accordance with approved drawings, specifications, and procedures
- implementation of those items delineated in the Administrative Controls Section of Technical Specifications
- timely referral of appropriate matters to management and the NSARB
- assuring that significant conditions adverse to quality are identified and corrected.

The Plant Manager, Ginna Station assigns responsibility to Superintendents and designated staff members for the control of all activities involving operation, maintenance, repair, refueling, implementation of modifications, radiation protection, ~~training,~~ chemistry, inventory control, storage of materials and equipment, control and storage of portable material handling equipment, fire protection and plant security. Responsibility is delegated for the implementation of Quality Assurance Program requirements at the plant for testing, operation and test status control, and calibration and control of measuring and test equipment.

Department Manager, Nuclear Engineering Services

The Department Manager, Nuclear Engineering Services is responsible to the Vice President, Nuclear Operations Group for:

- design of modifications to the facility in accordance with applicable design bases, regulatory requirements, codes, and standards
- implementation of the licensing/compliance program
- maintenance of Ginna Station design and licensing basis
- nuclear fuel management
- technical support for Ginna corrective action
- technical support for Ginna operations
- computer support
- procurement activities
- ~~fire protection~~

Department Manager, Nuclear Assessment

The Department Manager, Nuclear Assessment is responsible to the Vice President, Nuclear Operations Group for establishing the overall Quality Assurance Program. He is responsible for assuring that all planned and systematic actions necessary to provide adequate confidence that Ginna Station will operate safely and reliably are established and followed. He provides management with objective information concerning quality, independent of the individual or group directly responsible for performing the specific activity. He has the authority and organizational freedom to assure all necessary quality activities are performed. He is responsible for directing the activities of Quality Assurance and Operational Review~~, Nuclear Assurance, and Operating Experience. In addition, he is responsible for Nuclear Emergency Preparedness.~~

Manager, Quality Assurance

The Manager, Quality Assurance reports to the Department Manager, Nuclear Assessment and is responsible for all Quality Assurance and Quality Control functions. He and the Quality Assurance staff are responsible for interpreting corporate quality assurance policy and for assuring its implementation. This includes assuring that the program continues to satisfy the requirements of 10CFR50, Appendix B. He is responsible for establishing and implementing an independent assessment program that encompasses all organizations and functions related to the safe operation of Ginna including the qualified suppliers of safety related materials and services. Quality Assurance is also responsible for ensuring appropriate acceptance requirements for procured materials, equipment and services are included in procurement documents.

He and the Quality Control staff are responsible for assuring that station activities affecting quality are prescribed and carried out in accordance with approved drawings, specifications, and procedures. Quality Control is also responsible for ensuring the performance of verification inspection and receipt inspection activities and assuring that inspection requirements are included in approved procedures and work packages.

Manager, ~~Nuclear Assurance~~

~~The Manager, Nuclear Assurance reports to the Department Manager, Nuclear Assessment and is responsible for the control and maintenance of documents and records that have been transmitted to Records Management using approved processes. In addition, Nuclear Assurance provides technical support for trending and analysis of corrective action program data.~~

~~Director, Operational Review~~Operating Experience

The Manager, Operational Review~~Director, Operating Experience~~ reports to the Department Manager - Nuclear Assessment and has responsibility for supporting root cause investigations and corrective action for significant conditions adverse to quality. He is responsible for evaluating and disseminating industry experience information, and for ensuring that relevant and timely recommended actions are provided to management that will eliminate precursors of similar problems at Ginna Station. In addition, Operational Review is responsible for trending and analysis of corrective action program data.

Additionally, he is responsible for the control and maintenance of documents and records that have been transmitted to Records Management using approved processes.

Department Manager, Nuclear Training

The Department Manager, Nuclear Training is responsible to the ~~Plant Manager, Ginna Station~~ Vice President, Nuclear Operations Group for maintaining and implementing a National Academy for Nuclear Training accredited training program. In addition, he is responsible for Nuclear Emergency Preparedness.

CORPORATE SERVICES

Group Manager, Support Services

The Group Manager, Support Services is responsible to the Senior Vice President, Corporate Services for directing certain activities in support of Ginna Station. These activities include:

- purchasing of materials, services, and components from qualified suppliers, in accordance with applicable commercial, technical, and quality requirements.
- special processes
- inservice inspection
- maintenance of lifting and handling equipment
- training and qualification of welders and NDE personnel
- provision of personnel support for Ginna Station maintenance activities
- chemistry services
- laboratory testing and calibration of electrical M&TE reference standards.

TABLE 17.1.7-1 (cont'd)

Standard, Requirement, or Guide	Conformance Status	Remarks
Regulatory Guide 1.39 Rev.(2)-Housekeeping Requirements for Water-Cooled Nuclear Power Plants	Conforms	RG 1.39 Rev.(2) incorporates ANSI N45.2.3-1973.
Regulatory Guide 1.54 Rev.(0)-Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants	Alternative	Quality assurance requirements apply only when a coating performs a safety related function instead of the provisions stated in this Regulatory Guide and its referenced standard, ANSI N101.4-1972. See the UFSAR for quality assurance requirements used for existing coatings. For new coatings and configuration changes to existing coatings, either the quality assurance requirements of the UFSAR or the quality assurance requirements of 10CFR50, Appendix B are used instead of the detailed requirements included in this Regulatory Guide.
Regulatory Guide 1.58 Rev.(1)-Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel	Alternate	RG 1.58 Rev.(1) incorporates ANSI N45.2.6-1978. Ginna conforms to Reg. Guide 1.58 Rev.(1) and ANSI N45.2.6-1978 with the following exceptions; ~~that~~ • A 90 day grace period may be applied to the performance of annual evaluations of inspection, examination and testing personnel qualifications defined in Section 2.3 of ANSI N45.2.6-1978. • 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.
Regulatory Guide 1.64 Rev.(1)-Quality Assurance Requirements for Design of Nuclear Power Plants	Conforms	RG 1.64 Rev.(1) incorporates ANSI N45.2.11-1974.
Regulatory Guide 1.74 Rev.(0)-Quality Assurance Terms and Definitions	Conforms	RG 1.74 Rev.(0) incorporates ANSI N45.2.10-1973. Some definitions used by Ginna are worded differently than those in this standard; however, the general meanings are the same.

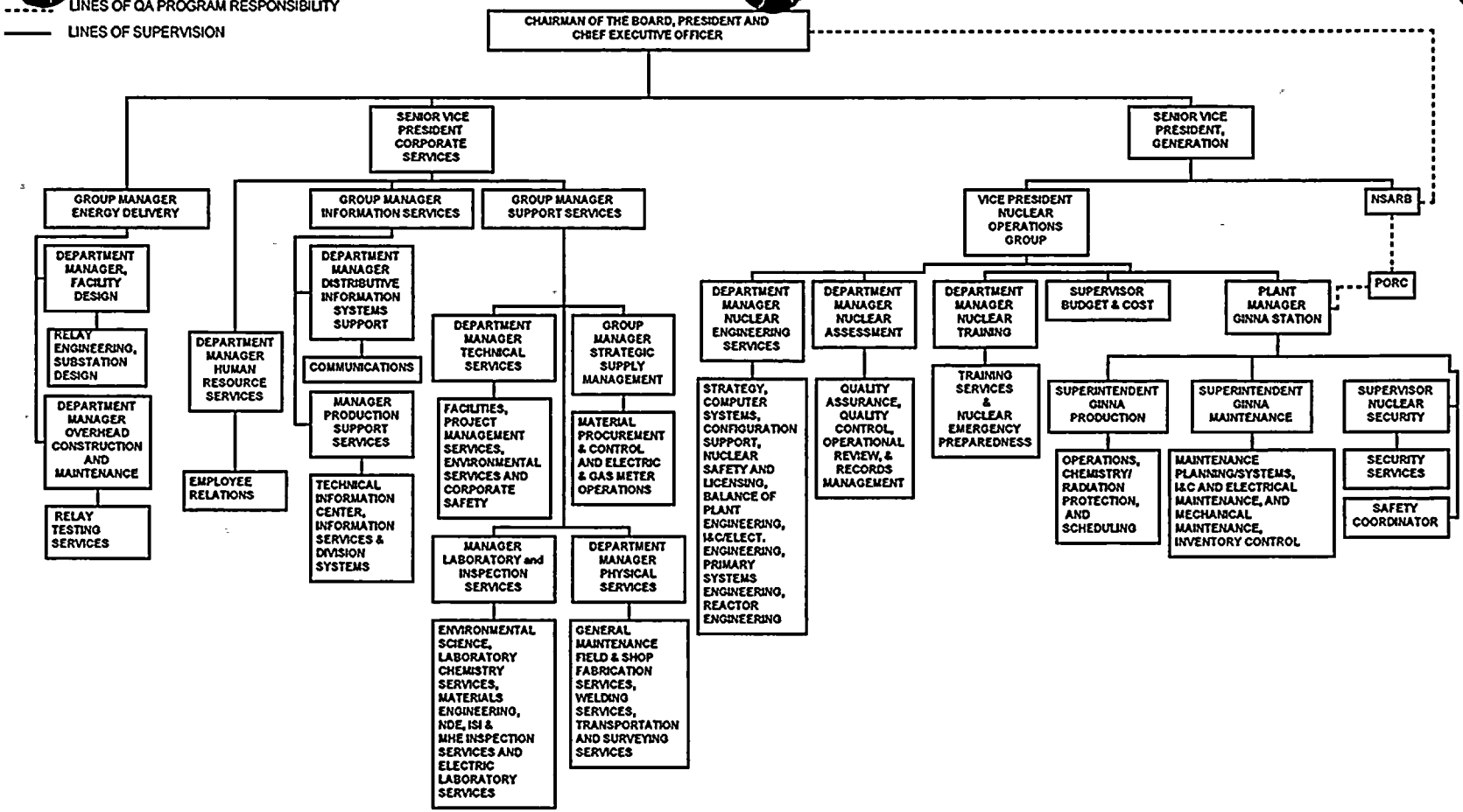
TABLE 17.1.7-1 (cont'd)

Standard, Requirement, or Guide	Conformance Status	Remarks
Regulatory Guide 1.88 Rev.(2)-Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records	~~Conforms~~ Alternative	RG 1.88 Rev.(2) incorporates ANSI N45.2.9-1974. Ginna conforms to ANSI N45.2.9-1974 as supplemented by the following alternatives to the requirements in Section 5.6 (Facility). • Records may be stored in a 2 hour rated facility meeting the requirements described in QAPSO Section 17.2.15. • Records may be stored temporarily in 1 hour fire rated cabinets provided that the requirements of QAPSO Section 17.2.15 are met.
Regulatory Guide 1.94 Rev. (1)-Quality Assurance Installation, Inspections, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants	Not applicable	RG 1.94 Rev.(1) incorporates ANSI N45.2.5-1974. Regulatory Guide applies to plants in the construction phase and was issued after Ginna was built.
Regulatory Guide 1.116 Rev.(0-R)-Quality Assurance Requirements for Installation, Inspections, and Testing of Mechanical Equipment and Systems	Conforms	RG 1.116 Rev.(0-R) incorporates ANSI N45.2.8-1975.
Regulatory Guide 1.123 Rev.(1)-Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Plants	Conforms	RG 1.123 Rev.(1) incorporates ANSI N45.2.13-1976.
Regulatory Guide 1.143 Rev.(1)-Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants	Alternative	See the UFSAR for design and quality assurance provisions applied to existing radioactive waste management systems, structures, and components. New systems, structures, and components and configuration changes to existing items meet the design and quality assurance provisions described in the UFSAR or those specified by this Regulatory Guide.
Regulatory Guide 1.144 Rev.(1)-Auditing of Quality Assurance Programs for Nuclear Power Plants	Alternate	RG 1.144 Rev.(1) incorporates ANSI N45.2.12-1977. Ginna conforms to RG 1.144 Rev.(1) and ANSI N45.2.12-1977 with the following exceptions: • ~~that~~ a grace period of 90 days may be applied to the performance of triennial supplier audits and annual supplier evaluations described in Section C.3.b.(2). • In lieu of the 30 day requirement of Section 4.5.1 of ANSI N45.2.12-1977 the following is used: 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.

TABLE 17.1.7-1 (cont'd)

Standard, Requirement, or Guide	Conformance Status	Remarks
Regulatory Guide 1.146 Rev.(0)-Qualification of QA Program Audit Personnel for Nuclear Power Plants	Alternate	RG 1.146 Rev.(0) incorporates ANSI N45.2.23-1978. Ginna conforms to RG 1.146 Rev.(0) and ANSI N45.2.23-1978 with the following exceptions: • ~~that~~ a grace period of 90 days may be applied to the performance of annual lead auditor recertifications described in Sections 3.2 and 5.3 of ANSI N45.2.23-1978. • In lieu of the requirements of 2.3.4 of ANSI N45.2.23-1978 the following is used: Prospective lead auditors shall demonstrate their ability to effectively implement the audit process and effectively lead an audit team. RG&E will describe this demonstration process in written procedures and shall evaluate and document the results of the demonstration. Regardless of the methods used for the demonstration, the prospective lead auditor shall have participated in at least one nuclear quality assurance audit within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI N45.2.23-1978, the individual may be certified as being qualified to lead audits.
Regulatory Guide 1.152 Rev.(0)-Criteria for Programmable Digital Computer System Software in Safety-Related Systems of Nuclear Power Plants	Alternative	Ginna conforms to Generic Letter 95-02, and its endorsement of NUMARC/EPRI Report TR-102348 "Guidelines on Licensing Digital Upgrades".
Regulatory Guide 4.15 Rev.(1)-Quality Assurance for Radiological Monitoring Program (Normal Operations)-Effluent Streams and the Environment	Adopted	Ginna conforms to the intent of this Regulatory Guide as addressed in the Process Control Program and applicable to Ginna effluent and environmental radioactivity measurements.
Regulatory Guide 7.10 Rev.(1)-Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material	Adopted	Ginna conforms to the intent of this Regulatory Guide as addressed in the Process Control Program.
10CFR21	Conforms	
10CFR50, Appendix A-General Design Criteria	Alternative	These criteria were in draft form or not written at the time Ginna was designed and built. For existing systems, see UFSAR for criteria applied. New systems, structures, and components, and configuration changes to existing items meet the criteria as described in the UFSAR or 10CFR50, Appendix A.

FIGURE 17.1.2-1
Organizational Chart



Changes or revisions to procurement documents are subject to the same review and approval requirements as the original documents.

Originating department review of procurement documents includes verification of applicable regulatory, code, and design requirements and suitability for intended service. In addition, a verification of proper inclusion of the quality standards, quality assurance program requirements, method of procurement, and the applicable acceptance criteria is performed. For spare or replacement parts, procurement documents are reviewed to determine similarity to, compatibility with, and acceptance criteria commensurate with the original design.

Supplier Selection

Selection of a supplier is based on the evaluation of their capability to provide the items or services in accordance with procurement document requirements. The evaluation, which is accomplished during procurement planning, determines the necessity for the supplier selection to be made from the approved suppliers list. For items and services procured from suppliers required to have a quality assurance program, supplier selection is made from the approved suppliers list or from those who are in the process of being added to the list. Addition of a supplier to the approved suppliers list is based on satisfactory evaluation of the supplier's quality assurance program. The evaluation guidelines for source selection considers the complexity of the item, method(s) of acceptance, and, for a replacement item, whether the source is to be restricted to the original supplier.

Items or services which meet industry standards and are typically utilized in applications other than nuclear may be purchased from suppliers not listed on the approved suppliers list, provided that item acceptance through receipt inspection can be based on acceptance of standard commercial quality. This is supplemented, as necessary, with source surveillance, pre- or post-installation tests, receipt tests, commercial supplier surveys, supplier test reports, or commercial supplier certificates. For commercial grade items and services, an evaluation of intended use is completed to determine critical characteristics which must be verified prior to acceptance for use.

Control of Supplier Performance

Control of supplier performance shall include:

- Monitoring supplier activities through audits and surveillances.
- Evaluation by requesting submittal of supplier documents for review.
- Identifying under what conditions suppliers are to report nonconformances.

~~Control of supplier performance includes monitoring and evaluation by requesting submittal of supplier documents for review and by identifying necessary changes for which nonconformances are to be reported. Control is also exercised through surveillance of supplier activities as necessary.~~

Acceptance of Items and Services

The verification methods for the acceptance of items and services are specified during procurement planning and purchase requisition preparation. Receipt inspection is a verification method common for the acceptance of items.

17.2.5 Procurement Verification

The supplier's overall quality assurance organization and program is evaluated in accordance with applicable parts of 10CFR50, Appendix B; codes and standards; and RG&E requirements. Suppliers on the approved suppliers list are reviewed annually for performance and program changes, and audited on a triennial basis.

The degree of supplier surveillance (including review, inspection, or audit) required during design, fabrication, inspection, testing, and shipping shall be determined and documented. The objectives of supplier surveillance are to provide a sampling review of the supplier's quality assurance program implementation and to verify product conformance with respect to the purchase order requirements. The extent of supplier surveillance will be consistent with the safety significance, complexity, quantity, and frequency of procurement of the item or service. As necessary, this may require verification of the activities of suppliers below the first tier.

The verification responsibilities for evaluation and surveillance of supplier activities are assigned to Quality Assurance.

Department supervision is responsible for receipt and control of items pending their acceptance.

Receipt inspection is performed for items and associated services for maintenance, repair, modification, and refueling. Inspections are performed to verify acceptability. To be acceptable, the items and services must conform to procurement documents, have satisfied required inspection and test requirements, and have documentary evidence of conformance available at the plant prior to acceptance for use. Personnel performing receipt inspection and test activities are trained and qualified.

17.2.6 Identification and Control of Items

17.2.15 Records

The Nuclear Policy Manual defines responsibility and establishes the basic requirements for quality assurance record retention and maintenance. Organizations performing quality affecting activities are responsible for forwarding the records they initiate to Records Management. Each organization generating records is responsible for preparation, review, approval, and implementation of specific quality assurance record procedures for their area of responsibility.

Records to be controlled are delineated in ANSI N45.2.9-1974. Sufficient records of items and activities are generated and maintained to document completed work. Items and activities requiring records include:

- design
- engineering
- procurement
- manufacturing
- construction
- inspection and test (e.g., manufacturer's proof and receipt)
- installation
- operations
- maintenance
- modification
- audits

Requirements and responsibilities for preparation, inspection, identification, indexing, review, storage, retrieval, maintenance, safekeeping, retention, and disposition of quality assurance records are in accordance with applicable records procedures, codes, standards, and procurement documents. ~~Requirements for records storage facilities are defined in the Nuclear Policy Manual.~~

Non-duplicated records shall be stored in facilities which meet one of the following requirements:

The first option is a NFPA Class A, four hour minimum rated facility. In addition, this facility shall consider the nine features described in ANSI N45.2.9-1974 Section 5.6 in its construction.

The second option a two hour rated facility designed to meet the requirements of NFPA-232 "Standard for the Protection of Records." These requirements may be met by any one of the following three ways: (1) a 2-hour vault meeting NFPA 232; (2) 2-hour rated file containers meeting NFPA 232 (Class B); or (3) a 2-hour rated fire resistant file room meeting NFPA 232. A fire resistant file room must meet the following additional provisions:

a. Early warning fire detection and automatic fire suppression should be provided, with electronic supervision at a constantly attended central station.

b. Records should be stored in fully enclosed metal cabinets. Records should not be permitted on open steel shelving. No storage of records should be permitted on the floor of the facility. Adequate access and aisle ways should be maintained at all times throughout the facility.

c. Work not directly associated with records storage or retrieval should be prohibited within the records storage facility. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards.

d. Smoking and eating/drinking should be prohibited throughout the records storage facility.

e. Ventilation, temperature, and humidity control equipment should be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the storage facility.

The third option is used when temporary storage of records (such as for processing, review, or use) is required. In this case, records shall be stored in a 1 hour fire rated container. The container shall bear a UL label (or equivalent) certifying 1 hour fire protection or be certified by a person competent in the technical field of fire protection. Additionally, sprinkler protection shall be provided in the area in which the containers are stored. The maximum allowable time limit for temporary storage is described in procedures.

The requirements and responsibilities for record accessibility and transmittal are described in the Nuclear Policy Manual. Removal of records from storage is documented and accountability is maintained by the responsible record control organization.

Operational Assessment

The Operational Reviewing ~~Experience~~ section receives and evaluates information from other utilities and vendors. The Nuclear Safety and Licensing section of Nuclear Engineering Services receives and evaluates information from INPO and the NRC. They ensure that relevant and timely recommended actions are provided to management that will eliminate precursors of similar problems at Ginna. This is accomplished through:

- coordinating feedback program to measure and improve the internalization of lessons learned from Operating Experience
- reviewing INPO SOERs and SERs
- reviewing vendor 10CFR Part 21 report of defects
- reviewing NRC information notices.

Table 17.3.2-1

Audit List

Audit Topic Areas (24 months)

a. The conformance of facility operation to ~~all~~ provisions contained within the Technical Specifications and applicable license conditions.

b. Performance, training, and qualifications of the operating and technical staff.

c. The results of ~~all~~ actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety.

d. The performance of ~~all~~ activities required by the Quality Assurance Program to meet the criteria of 10CFR50, Appendix B.

e. Facility Fire Protection Program and implementing procedures.

f. Inspection and audit of the fire protection and loss prevention program performed by non-licensee personnel. The personnel may be representatives of ANI, an insurance brokerage firm, or other qualified individuals.

g. The radiological environmental monitoring program and the results thereof.

h. The Offsite Dose Calculation Manual and implementing procedures.

i. The Process Control Program and implementing procedures.