

April 12, 2000

Dr. Robert C. Mecredy
Vice President, Nuclear Operations
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, NY 14649

SUBJECT: APPROVAL OF PROPOSED REVISION 27 TO THE ROCHESTER GAS AND ELECTRIC CORPORATION'S (RG&E) R.E. GINNA NUCLEAR POWER PLANT QUALITY ASSURANCE PROGRAM FOR STATION OPERATION (TAC NO. MA7874)

Dear Dr. Mecredy:

By letter dated December 20, 1999, as supplemented by letter dated February 17, 2000, you transmitted proposed Revision 27 to the R. E. Ginna Nuclear Power Plant Quality Assurance Program for Station Operation (QAPSO). Revision 27 to the QAPSO was submitted in accordance with the requirements of 10 CFR 50.54(a)(3) as reflecting changes that reduced commitments in the QAPSO description previously approved by the NRC. Specifically, RG&E proposed to modify QAPSO commitments associated with Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Rev. 0, ANSI N18.7/ANS-3.2 -1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," and to eliminate in-line reviews of procurement documents by quality assurance personnel.

The enclosed safety evaluation (SE) documents the bases for our conclusion that the reductions in commitments identified by you in Revision 27 to the QAPSO continue to satisfy the requirements of Appendix B to 10 CFR Part 50 and are, therefore, acceptable.

Any questions related to the enclosed SE should be directed to me at 301-415-1441 (E-mail: gsv@nrc.gov).

Sincerely,
/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure: As stated

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
PROPOSED REVISION 27 TO THE ROCHESTER GAS AND ELECTRIC CORPORATION
QUALITY ASSURANCE PROGRAM FOR STATION OPERATION

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

By letter dated December 20, 1999 (Reference 1), Rochester Gas and Electric Corporation (RG&E) transmitted proposed Revision 27 to the R. E. Ginna Nuclear Power Plant Quality Assurance Program for Station Operation (QAPSO). Revision 27 to the QAPSO was submitted in accordance with the requirements of 10 CFR 50.54(a)(3) as reflecting changes that reduced commitments in the QAPSO description previously approved by the NRC. Specifically, RG&E proposed to modify QAPSO commitments associated with Regulatory Guide 1.33, (RG) "Quality Assurance Program Requirements (Operation)," Rev. 0, ANSI N18.7/ANS-3.2 -1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," and to eliminate in-line reviews of procurement documents by quality assurance personnel.

As a result of a January 27, 2000, request for additional information by the NRC staff (Reference 2), RG&E supplemented its original submittal via correspondence dated February 17, 2000. This supplement modified certain changes previously identified in the original submittal and provided the additional information requested by the staff.

2.0 EVALUATION

2.1 Proposal to Eliminate In-line Reviews of Procurement Documents by Quality Assurance Personnel

In Section 17.1.2, "Organization," of the QAPSO, RG&E describes the major organizations participating in the Quality Assurance (QA) program at R. E. Ginna. Section 17.1.2 currently designates QA as "also responsible for ensuring appropriate acceptance requirements for procured materials, equipment and services are included in procurement documents." This requirement has been implemented by RG&E through the review of safety-related procurement documents by QA personnel. However, RG&E has proposed that the procurement document review function be transferred to line personnel who will perform such reviews in accordance with the criteria in QAPSO Section 17.2.4, "Procurement Control." The QA organization would assess the effectiveness of this process through a program of planned and periodic independent assessments conducted in accordance with QAPSO Section 17.3.2, "Assessments."

In the January 27, 2000, request for additional information, the NRC staff requested that RG&E amend its submittal to clarify where commitments associated with the review of procurement documents by the line organizations, including their requisite training and qualification, are currently (or will be) identified in the QAPSO.

In the February 17, 2000, response to the NRC staff (Reference 3), RG&E proposed to amend the QAPSO Section 17.2.4 to stipulate that personnel performing procurement document reviews shall be trained and qualified in accordance with the training program discussed in QAPSO Section 17.1.5, "Personnel Training and Qualification."

While RG&E's proposed alternative would have the line organization perform procurement document reviews, RG&E's commitment to procurement document review methods and processes (as well as associated personnel qualification requirements) specified in ANSI N45.2.13-1976, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," as endorsed by RG 1.123, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," Revision 1, remain unchanged. On this basis, the staff concludes that RG&E's proposed approach continues to satisfy the applicable guidance in RG 1.123 and NUREG-0800, the "Standard Review Plan" (SRP), and is, therefore, acceptable.

2.2 Proposal to Eliminate Commitment to ANSI N18.7/ANS-3.2-1976, Section 4.3.1, "Personnel"

In Table 17.1.7-1, "Conformance of Ginna Station Program to Quality Assurance Standards, Requirements and Guides," of the QAPSO, RG&E currently relies on its commitment (with exceptions) to RG 1.33, "Quality Assurance Program Requirements (Operations)," Revision 0, to satisfy the requirements of Appendix B to 10 CFR Part 50. RG&E's commitment to RG 1.33 is described as follows:

"Regulatory Guide 1.33 Rev. (0) incorporates ANSI N18.7-1972. Ginna conforms to Regulatory Guide 1.33 Rev. (0) except for Appendix A and conforms to ANSI N18.7-1972 except for Section 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.3, and 4.5. In place of these excepted sections the following requirements are substituted. Ginna conforms to RG 1.33 Rev. (2) Regulatory Positions 1 (including its Appendix A) and 3 (which invokes and modifies ANSI N18.7-1976/ANS-3.2 Section 4.3.4) and conforms to ANSI N18.7-1976/ANS-3.2 Section 4.3.1, 4.3.2 and 4.3.4 (as modified) for the offsite review function, excluding staffing. Ginna conforms to ANSI N18.7-1972 section 4.4 with the exception that a 90 day grace period may be applied to the 24 month frequency for performance of internal audits. Ginna conforms to ANSI/ANS 3.2-1988 Section 4.3 for the requirements of the onsite review function. Ginna also conforms to the regulatory staff comments and supplementary guidance in "Guidelines on Quality Assurance During the Operations Phase of nuclear Power Plants," Revision 0, October 1973 (Orange Book Revision 0)."

Additionally, RG&E relies on its commitment to Section 4.7, "Independent Review Personnel," of ANSI/ANS 3.1-1987, "Selection, Qualification and Training of Personnel for Nuclear Power Plants," to satisfy the qualification requirements of the Nuclear Safety Audit and Review Board (NSRB) members at Ginna.

In the December 20, 1999, letter to the NRC, RG&E proposed to modify commitments associated with RG 1.33 as follows:

- Eliminate its commitment to Section 4.3.1, "Personnel," of ANSI N18.7/ANS-3.2-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."

Section 4.3.1 of ANSI N18.7/ANS-3.2-1976 stipulates the qualification and experience requirements for personnel assigned responsibility for independent reviews (offsite) at nuclear power plants. However, Section 4.7 of ANSI/ANS 3.1-1987 also describes qualification and experience requirements for personnel discharging the offsite review function.

Accordingly, by rescinding its commitment to Section 4.3.1 of ANSI N18.7/ANS-3.2-1976, RG&E eliminates overlapping and potentially conflicting commitments in its QAPSO, and continues to rely on Section 4.7 of ANSI/ANS 3.1-1987 to satisfy the qualification and experience requirements for Nuclear Safety Review Board (NSRB) members at Ginna. Therefore, the elimination of RG&E's commitment to Section 4.3.1 of ANSI N18.7/ANS-3.2-1976 has no impact on the QAPSO or on its compliance with the requirements of Appendix B to 10 CFR Part 50 and is acceptable.

- Revise Table 17.1.7-1, RG 1.33, Rev. 0, "Remarks," to state: "The on-site review organization scope of review, organization, quorum and records meet the requirements of ANSI/ANS-3.2-1988, Section 4.3. The qualification requirements for PORC members and PORC meeting frequency is described in QAPSO Section 17.1.2, "PORC."

QAPSO Section 17.1.2, "PORC," third paragraph, and Table 17.1.7-1, RG 1.33, Rev. 0, "Remarks," both affirm RG&E's current reliance on a commitment to Section 4.3 of ANSI/ANS-3.2-1988, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," to establish PORC-related requirements.

In QAPSO Section 17.1.2, RG&E describes the qualification requirements for PORC membership and meeting frequency. RG&E conforms to these requirements rather than to those described in Sections 4.3.2 and 4.3.4 of ANSI/ANS-3.2-1988. Accordingly, the revision to Table 17.1.7-1 described above will not introduce any changes to current commitments in the QAPSO but rather clarify or eliminate potential conflicts between existing commitments. Therefore, the inclusion of the subject paragraph in Table 17.1.7-1 has no impact on the QAPSO or on its compliance with the requirements of Appendix B to 10 CFR Part 50 and is acceptable.

3.0 CONCLUSION

The alternatives proposed by RG&E for the QA activities described above continue to satisfy the provisions of Section 17.2 of the SRP. Therefore, the proposed Revision 27 to RG&E's QAPSO incorporating the reductions in commitments identified above will continue to comply with the quality assurance criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

Principal Contributor: J. Peralta

Date: April 12, 2000

4.0 REFERENCES

1. RG&E (R.C. Mecredy) letter to USNRC (G.S. Vissing), "Revised Submittal of Quality Assurance Program for Station Operation - R.E. Ginna Nuclear Power Plant - Docket Number 50-244," dated December 20, 1999.
2. USNRC (G.S. Vissing) Letter to RG&E (R.C. Mecredy), "Review of Rochester Gas and Electric Company - R.E. Ginna Nuclear Power Plant Quality Assurance Program Description Submittal of December 20, 1999, in accordance with 10 CFR 50.54(a) requirements (TAC No. MA47874)," dated January 27, 1999.
3. RG&E (R.C. Mecredy) letter to USNRC (G.S. Vissing), "Revised Submittal of Quality Assurance Program for Station Operation - R.E. Ginna Nuclear Power Plant - Docket Number 50-244," dated February 17, 2000.