



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20545-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED REVISION 25 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 17, 1997, Rochester Gas and Electric Corporation (RG&E) transmitted proposed Revision 24 to the R. E. Ginna Nuclear Power Plant Quality Assurance Program for Station Operation (QAPSO). Revision 24 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. However, this submittal also included changes for which RG&E was not seeking NRC approval based on the licensee's conclusion that they had no impact on commitments in the QAPSO.

As a result of requests for additional information by the NRC staff (Reference 2) and additional reorganization changes, RG&E amended or clarified its original submittal via correspondence dated April 6, 1998 (Reference 3). This submittal forwarded Revision 25 to the QAPSO which provided additional justification for changes previously identified as reductions in commitment in Revision 24 to the QAPSO, and also identified new organizational changes for which RG&E was not seeking NRC approval. Therefore, Revision 25 to the QAPSO superseded Revision 24 in its entirety. This evaluation only addresses changes in Revision 25 to the QAPSO which RG&E has deemed to be reductions in commitment pursuant to 10 CFR 50.54(a)(3).

2.0 EVALUATION

In its December 17, 1997, submittal (Reference 1), RG&E proposed to establish that a "grace period" of twenty five per cent (25%), not to exceed 90 days, be applied to frequencies for performance of periodic activities described in the QAPSO and the regulatory guides and standards listed in the QAPSO, Table 17.1.7-1, "Conformance of Ginna Station Program to Quality Assurance Standards, Requirements, and Guides."

In its request for additional information (RAI) dated April 6, 1998, the NRC requested that RG&E supplement its submittal to clarify which specific periodic activities described in Table 17.1.7-1 of the QAPSO would be affected by the (plus) 25% "grace period." NRC also requested that RG&E describe the impact of the proposed deferral on RG&E's audit activities and corresponding commitments to Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)", and RG 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants." RG&E incorporated its response to the NRC's RAI in Revision 25 to QAPSO which was transmitted via letter dated June 4, 1998. In this revision to the QAPSO, RG&E proposed to revise its commitments to RGs and standards as necessary to apply a grace period of 90 days for the performance of the following activities:

- Annual Supplier Evaluations in accordance with RG 1.144, Revision 1: (Section C.3.b.2)
- Triennial Vendor Audits in accordance with RG 1.144, Revision 1 (Section C.3.b.(2))
- Recertification in accordance with ANSI N45.2.23-1978, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants" (Sections 3.2 and 5.3)
- Annual Evaluations in accordance with ANSI N45.2.6-1978, "Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants" (Section 2.3)
- Internal Audits in accordance with ANSI N18.7-1972, (Section 4.4)

Specifically, RG&E has proposed to modify its RG commitment as follows:

1. RG 1.33, Revision 0

Internal Audits - Section C.3.a.(1) of RG 1.144 refers to RG 1.33 for requirements. Since RG&E is committed to RG 1.33, Revision 0, except for Appendix A, ANSI N18.7-1972 requirements are invoked. A grace period of 90 days will be applied to the 24-month frequency for internal audits described in Section 4.4 of ANSI N18.7-1972, which states that audits of safety related activities are completed "within a period of two years." RG&E noted that this grace period will not be applied to audits of the Nuclear Emergency Response Plan to satisfy the requirements of 10 CFR 50.54(t), and Station Security Plan to satisfy the requirements of 10 CFR 50.54(p)(3), 73.56 (g)(1) and (g)(2) and 10 CFR 73.55(g)(4). Audit frequency and further discussion of these audits are described in their respective plans.

2. RG 1.58, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel," Revision 1

Annual Evaluations - Section 2.3 of ANSI N45.2.6-1978 states that "Any person who has not performed inspection, examination, or testing activities in his qualified area for a period of one year shall be reevaluated." The 90-day grace period will be applied to this activity.

3. RG 1.144, Revision 1

(a) Supplier Audits - Section C.3.b.(2) of Reg. Guide 1.144, Revision 1 states that audits be performed on a "triennial basis." The 90-day grace period will be applied to this activity. Section 17.2.5 of the QAPSO is being revised to allow for application of the grace period.

(b) Supplier Evaluations - Section C.3.b.(2) of Reg. Guide 1.144 Revision 1 states that documented evaluations be performed "annually." The 90-day grace period will be applied to this activity.

(c) Revised commitment to perform vendor audits from "at least every three years" to "on a triennial basis" to be consistent with the wording used in RG 1.144, Revision 1, Section C.3.b.(2).

4. RG 1.146, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants," Revision C

Lead Auditor Recertifications - Sections 3.2 and 5.3 of ANSI N45.2 23-1978 require that an annual assessment be performed of each lead auditor's qualification and that each lead auditor's records be updated annually. The 90-day grace period will be applied to this activity

Additionally, RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days.

Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," requires, in part, that the quality assurance program provide for indoctrination and training of personnel performing activities affecting quality as necessary to ensure that such personnel achieve and maintain suitable proficiency, and it also establishes that audits of the quality assurance programs for these facilities (including their suppliers) be conducted at regular intervals. As described above, RG&E relies on its commitments to RGs 1.33, 1.58, 1.144, and 1.146 to satisfy these requirements.

While Appendix B to 10 CFR Part 50 provides that audits be performed "periodically," and that suitable personnel proficiency be maintained, it does not provide specific intervals for performing these activities. As a result, the NRC established nominal periodicity intervals for certain activities described in RGs 1.33, 1.58, 1.144, and 1.146. However, the NRC staff's regulatory position on the required periodicity for these activities was not aimed at preventing flexibility in the scheduled performance of such activities but rather at providing an objective measure for ensuring plant personnel proficiency and suitable periodic intervals for activities affecting quality as required by the regulations.

Since the 90-day grace period proposed by RG&E only aims to allow some limited additional flexibility in scheduling activities associated with the subject RGs, personnel proficiency standards and periodicity objectives in the QAPSO will remain unchanged. This is consistent with the provisions in Section 17.2 of NUREG-0800, "Standard Review Plan," (SRP) and is, therefore, acceptable.

3.0 CONCLUSION

While the proposed 90-day deferral period (grace period) proposed by RG&E for the RG activities described above constitute a reduction in commitments in the QA program description previously approved by the NRC, such exceptions continue to satisfy the provisions of Section 17.2 of the SRP. Therefore, proposed Revision 25 to RG&E's QAPSO, dated June 4, 1998, continues to comply with the quality assurance criteria of Appendix B to 10 CFR Part 50 and is acceptable.

4.0 REFERENCES

- 1.0 Robert C. Mecredy (RG&E) letter to USNRC, "Revised Submittal of Quality Assurance Program for Station Operation - R.E. Ginna Nuclear Power Plant - Docket No. 50-244," dated December 17, 1997.
- 2.0 USNRC Letter to RG&E, "Request for Additional Information Concerning Revision 24 of the Quality Assurance Plan for the R.E. Ginna Nuclear Power Plant (TAC No. MA0391)," dated April 6, 1998.
- 3.0 Robert C. Mecredy (RG&E) letter to USNRC, "Revised Submittal of Quality Assurance Program for Station Operation - R.E. Ginna Nuclear Power Plant - Docket No. 50-244," dated June 4, 1998.

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