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VISSING,G.S.

see Reports

SUBJECT: Forwards rev 24 to "QAP for Station Operation," incorporating listed changes.W/synopsis of changes included.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 17, 1997

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 24 to the Quality Assurance Program for Station Operation. Revision 24 incorporates the following changes:

- Organization related changes associated with the restructuring of the corporation and the Nuclear Operations Group.
- Clarifications of responsibilities.
- Establishment of an alternate commitment for Regulatory Guide 1.152.
- Rewrite of the process for procedure reviews.

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 will be considered effective 1/5/98.

Additionally, Revision 24 of QA Program for Station Operations incorporates the following change:

- Establish that a grace period of +25% (not to exceed 90 days) may be applied to frequencies for performance of periodic activities described by this document and the Regulatory Guides and Standards listed in Table 17.1.7-1. This grace period will not be applied to 10CFR requirements listed in Table 17.1.7-1.

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The above change impacts the commitments (Reduction in Commitment) in the Quality Assurance Program description previously approved by the NRC, and therefore requires 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 23 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.R24
Attachments 1 and 2
Enclosure: QA Program for Station Operation Revision 24

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

Synopsis of Changes

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 current Chairman of the Board and Chief Executive Officer is retiring on 12/31/97. The current President and Chief Operating Officer is assuming the duties of the Chairman of the Board, President and Chief Executive Officer. The Chief Operating Officer position will not be replaced.

- The Corporate Services Unit has assumed responsibility for Support Services, which now includes Strategic Supply Management.

- The Energy Delivery Group now reports directly to the Chairman of the Board, President and Chief Executive Officer.

- The Supply Chain Management Section was created. This section reports to the Vice President Nuclear Operations Group and has resulted in the following changes:

  - Responsibility for procurement was transferred from the Department Manager, Nuclear Engineering Services to Supply Chain Management. Nuclear Engineering Services retains the responsibility for procurement of nuclear fuel.

  - Responsibility for inventory control and storage of material and equipment was transferred from the Plant Manager, Ginna Station to Supply Chain Management.

  - Section 17.2.5, Procurement Verification, was revised to clarify responsibilities.

  - Organization Chart was revised to show new SCM organization and reporting relationships for QA/QC Procurement.

- The responsibility for Quality Control functions was transferred from the Manager, Nuclear Assurance to Manager, Quality Assurance. The Manager, Quality Assurance is now responsible for all QA and QC functions.

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

ATTACHMENT 1

Synopsis of Changes

17.1 MANAGEMENT

17.1.2 Organization

Manager, Nuclear Assurance	-	Changed to provide clarification on the responsibilities of Nuclear Assurance for documents and records.
Group Manager, Support Services	-	Fifth Bullet - Removed responsibility for training of riggers and crane operators. This responsibility now belongs to Fossil/Hydro Training.
NSARB	-	First Paragraph - The members of the NSARB are now appointed by the Chairman of the NSARB rather than the Chairman of the Board and CEO. However, the Chairman and Vice-Chairman of the NSARB are still appointed by the Chairman of the Board, President and Chief Executive Officer.
	-	Second Paragraph - Deleted. These requirements are details that are not necessary in this document. These requirements are contained in Nuclear Operations Group Interface Procedures.

17.1.7 Regulatory Commitments

The second paragraph was added to allow for applying a grace period to activities defined by the QA Program which are conducted on a periodic basis.

The current QAPSO allows for only a literal interpretation of the requirements for performing activities on a periodic basis such as, "annually", "every three years", "every 24 months" etc. Therefore, for example, the performance of an annual supplier evaluation or lead auditor recertification must be performed by the same calendar date as it was performed in the previous year.

Therefore, the application of a grace period is being requested which will allow flexibility in scheduling activities. The 25% tolerance was selected to be consistent with Technical Specification SR 3.0.2 grace period requirements.

This change is considered a reduction in commitment and will not be implemented until NRC approval is received.

ATTACHMENT 1

Synopsis of Changes

The details of implementation of this grace period will be incorporated into the Nuclear Policy Manual. The Nuclear Policy Manual will identify the specific activities for which the grace period may be applied.

Additionally, the grace period will not allow the "clock" for a particular activity to be reset forward. For example, if an annual activity is due on June 15, 1998, but is not performed until August 13, 1998, the next due date for that activity will be June 15, 1999. However, the clock for an activity may be reset backwards by performing the activity early, if desired to balance work load.

Since the clock for an activity can not be reset forward, the average frequency at which an activity is performed will remain the same. Therefore, this QA Program change continues to satisfy the criteria of 10CFR50 Appendix B.

Table 17.1.1-2 Supplementary Glossary

Revised the definition of "safety-related structure, systems and components" to be consistent with the definitions contained in 10CFR65(b)(1)a and 10CFR50.49(b)(1).

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

Regulatory Guide 1.33

Corrected typo made in Rev. 23.

Regulatory Guide 1.152

Established commitment for alternative use of Generic Letter 95-02, and its endorsement of NUMARC/EPRI Report TR-102348 "Guidelines on Licensing Digital Upgrades".

ATTACHMENT 1

Synopsis of Changes

17.2 PERFORMANCE/VERIFICATION

17.2.4 Procurement Control

Second Paragraph

Added clarification regarding the procurement of items on a non-safety related purchase order, which are to be dedicated for safety related applications.

17.2.5 Procurement Verification

Second Paragraph

Revised to remove responsibility for procuring department to determine the degree of supplier surveillance. The responsibility for this determination is addressed in plant procedures.

17.2.14 Document Control

First Paragraph

Revised to clarify requirements for control of controlled documents and associated procedures.

Third Paragraph

Rewritten to clarify requirements for review of procedures. Added requirement that the technical reviewer is not to have been involved with formulating the change.

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