



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
PROPOSED REVISION 26 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 21, 1998, (Reference 1) as supplemented March 1, 1999, Rochester Gas and Electric Corporation (RG&E) transmitted proposed Revision 26 to the R. E. Ginna Nuclear Power Plant Quality Assurance Program for Station Operation (QAPSO). Revision 26 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 a request for additional information (RAI) by the NRC staff (Reference 2), RG&E amended its original submittal via correspondence dated March 1, 1999 (Reference 3). This submittal modified certain changes previously identified in the original submittal and provided the additional information requested by the staff. This evaluation only addresses changes in Revision 26 to 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," which RG&E has deemed to be reductions in commitment pursuant to 10 CFR 50.54(a)(3).

2.0 EVALUATION

2.1 Proposed Alternative to Regulatory Guide (RG) 1.58, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel," Revision 1, and its Endorsement of SNT-TC-1A-1975 for the Qualification and Certification of Nondestructive Testing Personnel

In its December 21, 1998, submittal (Reference 1), RG&E proposed to modify its commitment to RG 1.58 to allow use of the later version of SNT-TC-1A (1980) used in the American Society of Mechanical Engineers (ASME) Code Section XI currently in effect at the R. E. Ginna Nuclear Power Plant. The staff agreed with the basis of RG&E's concerns relative to the presence of this conflict in the QA and Inservice Inspection (ISI) programs. However, the staff requested an RAI dated February 17, 1999 (Reference 2), that RG&E clarify its proposed

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alternative to RG 1.58. Accordingly, in its March 1, 1999, response to the staff's RAI (Reference 3), RG&E modified its proposed alternative to RG 1.58 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. Section XI of the ASME Code contains specific requirements for nondestructive examination and also references the use of other supplementary standards for the qualification and certification of personnel performing nondestructive examinations. The applicable versions of the standards referenced in Section XI of the ASME code, as permitted for use by 10 CFR Part 50.55a, may be used for the qualification and certification of personnel performing nondestructive examinations required by Section III and Section XI of the ASME Code in lieu of the standard identified in Reg. Guide 1.58, Rev. 1, (SNT-TC-IA-1975) provided that other applicable rules contained in Section XI of the ASME Code are met."

The staff finds that RG&E's exception to RG 1.58, above, satisfies the requirements of Appendix B to 10 CFR Part 50, and 10 CFR Part 50.55a and is, therefore, acceptable.

2.2 Proposed Alternative to RG 1.88, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records," Revision 2

RG&E is committed to RG 1.88 which conditionally endorses ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants." Section 5.6 of ANSI N45.2.9-1974 specifies the use of a 4-hour fire rated facility for non-duplicated records. However, in its December 21, 1998, submittal (Reference 1) RG&E requested 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.

As justification for these alternatives, RG&E proposed to revise QAPSO Section 17.2.15, "Records," to incorporate the following provisions:

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 in NUREG-0800, "Standard Review Plan," (SRP) Section 17.1, "QA During the Design and Construction Phases." Paragraph 17.4 of this section under Quality Assurance Records (Paragraph 17.1.17) describes the use of 2-hour rated records storage facilities meeting NFPA 232 requirements.



Temporary Storage of Records

The use of temporary storage is requested to allow the use of 1-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 1-hour rated cabinets will be controlled by procedures which specify a maximum allowable time limit.

The records processing room in which the 1-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 provide additional protection to the records stored in the cabinets. Therefore, the records stored in these cabinets are effectively providing greater than 1-hour rated protection.

Since the alternatives proposed by RG&E, above, and as described in QAPSO Section 17.2.15, "Records," are explicitly allowed alternatives described in Paragraph 17.4, Section 17.1 of the SRP, the staff finds these alternatives to RG 1.88 acceptable.

2.3 Proposed Alternative to the 30-Day Corrective Action Completion Provisions in RG 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants" (January 1979)

In its December 21, 1998, submittal (Reference 1), RG&E proposed to allow audited organizations to respond to audit findings within the time-frame imposed by their safety-significance (as determined by the licensee's corrective action process) rather than within the 30-day period imposed by RG 1.144. RG 1.144 conditionally endorses the provisions in ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants," as providing an adequate basis for complying with the pertinent requirements of Appendix B to 10 CFR Part 50.

Section 4.5.1 of ANSI N45.2.12-1977 requires that "[i]n the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for corrective action."

In its RAI dated February 17, 1999 (Reference 2), the NRC requested that RG&E supplement its submittal to clarify the timeliness provisions that would govern corrective actions for significant conditions adverse to quality. While acknowledging that subsection 4.5.1 of ANSI N45.2.12 already allows for delays in corrective actions that cannot be completed within 30 days, the staff was concerned that the licensee's proposal would not sufficiently emphasize the necessity of promptly resolving significant conditions adverse to quality in a manner consistent with the provisions of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. Accordingly, RG&E was asked to clarify how its corrective action process would prioritize significant audit findings.

In its March 1, 1999, response to the staff's RAI (Reference 3), RG&E modified its proposed alternative to RG 1.144 specifying that for audit findings that are determined to be significant conditions adverse to quality, the audited organization's response shall be provided within 30 days. The staff finds that this proposed alternative is consistent with the provisions in Section 17.2, "Quality Assurance During the Operations Phase," of the SRP, and with the requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

2.4 Proposed Alternative to Lead Auditor Certification Provisions in RG 1.146, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants," Revision 0

RG&E is currently committed to RG 1.146, Rev. 0, which conditionally endorses ANSI N45.2.23-1978, "Qualification of Quality Assurance Audit Personnel for Nuclear Power Plants." 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.

In lieu of the requirements of Section 2.3.4 of ANSI N45.2.23-1978, RG&E proposed the following alternative in its December 21, 1998, submittal (Reference 1):

"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."

In an October 24, 1996, letter to the Nuclear Energy Institute (Reference 4), the NRC staff provided its position with regards to acceptable industry proposed alternatives on QA processes for qualifying auditors and for conducting annual evaluations of suppliers.

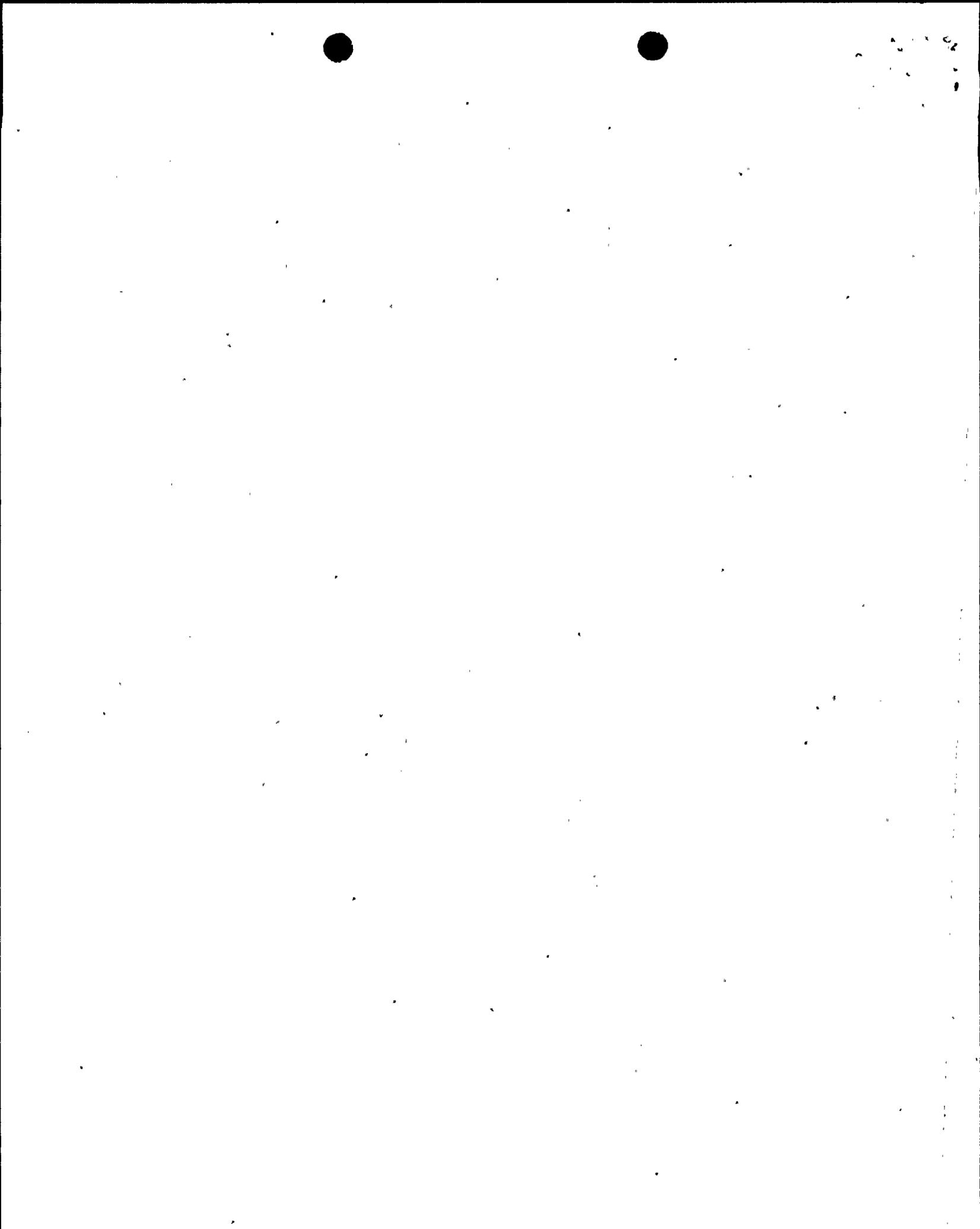
RG&E's proposed alternative for certifying lead auditors, as described above, is consistent with the staff's position in the cited letter and is, therefore, acceptable.

3.0 CONCLUSION

While the proposed alternatives 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, the proposed Revision 26 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.

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Date: April 6, 1999



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 21, 1998.
2. USNRC (G.S. Vissing) letter to RG&E (R.C. Mecredy), "Revised Submittal of Quality Assurance Program for Station Operation, Request for Additional Information - R.E. Ginna Nuclear Power Plant (TAC No. MA4455)," dated February 17, 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 March 1, 1999.
4. USNRC letter to the Nuclear Energy Institute, "Review of Nuclear Energy Institute (NEI) Proposed Improvements to Quality Assurance Programs (Reference NEI Letter, dated January 30, 1996)," dated October 24, 1996.