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SUBJECT: Forwards rev 25 to "QA Program for Station Operation," incorporating listed changes,per 10CFR50.54(a)(3).

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ROBERT C. MECREDY
Vice President
Nuclear Operations

June 4, 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

REFERENCES: a. Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: "Revised Submittal of Quality Assurance Program for Station Operation," dated December 17, 1997.

b. Letter from G.S. Vissing, NRC, to R.C. Mecredy, RG&E, Subject: "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.

Dear Mr. Vissing:

In accordance with 10 CFR 50.54(a)(3), enclosed is Revision 25 to the Quality Assurance Program for Station Operation. Revision 25 incorporates the following changes:

- Organization related changes associated with the restructuring of the Supply Chain organization within the Nuclear Operations Group.
- Organization title changes for Senior VP, Generation.

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 7/1/98.

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Additionally, in Revision 24 of QA Program for Station Operations (Reference a), RG&E requested 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.

On April 6, 1998, the NRC requested additional information concerning this change in Reference b. RG&E is modifying the change requested in Reference a and is providing the additional information requested by the NRC in this submittal of Revision 25.

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 24 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.R25
Attachments 1 and 2
Enclosure: QA Program for Station Operation Revision 25

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 Supply Chain Management (SCM) Section was eliminated and has resulted in the following changes:
  - Responsibility for procurement was transferred from Supply Chain Management to the Department Manager, Nuclear Engineering Services.
  - Responsibility for inventory control and storage of material and equipment was transferred from Supply Chain Management to the Plant Manager, Ginna Station.
  - Section 17.2.5, Procurement Verification, was revised.
  - Organization Chart was revised to eliminate the SCM organization.
- The title for the Senior Vice President, Energy Operations was changed to Senior Vice President, Generation. This change was in title only. No QA Program responsibilities were revised.

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

17.1 MANAGEMENT

17.1.7 Regulatory Commitments

In Reference a, a paragraph was added to allow for applying a grace period to activities defined by the QA Program which are conducted on a periodic basis. This change required NRC approval prior to implementation and was not made effective.

Discussions with NRC Staff indicate that a general approach to applying a grace period is unacceptable. Therefore, the specific activities for which a grace period will be applied are identified on Table 17.1.7-1. The second paragraph requested in Rev. 24 is revised in the Rev. 25 submittal.

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Synopsis of Changes

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

RG&E is revising its commitments to Regulatory Guides and standards as necessary to apply a grace period of 90 days for the performance of the following activities:

- Annual Supplier Evaluations (RG 1.144 Rev. 0 Sect. C.3.b.2)
- Triennial Vendor Audits (RG 1.144 Rev. 0 Sect. C.3.b.(2))
- ANSI N45.2.23 Recertifications (Sections 3.2 and 5.3)
- ANSI N45.2.6 Annual Evaluations (Section 2.3)
- Internal Audits (ANSI N18.7-1972 Section 4.4)

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 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 is reset backwards by performing the activity early. Since the clock for an activity can not be reset forward, the average frequency at which an activity is performed will remain the same.

Technical Specifications currently allow the use a 25% grace period for the performance of periodic surveillances. Based on the administrative controls that will be put in place, this QA Program change continues to satisfy the criteria of 10CFR50 Appendix B.

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Synopsis of Changes

Specifically, the following commitments are being modified:

RG 1.33 Rev 0 - The following exception is being requested:

1. 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, Rev. 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".

   NOTE: This grace period will not be applied to audits of the Nuclear Emergency Response Plan to satisfy the requirements of 10CFR50.54 (t), and Station Security Plan to satisfy the requirements of 10CFR50.54 (p)(3), 73.56 (g)(1) and (g)(2) and 10CFR73.55 (g)(4). Audit frequency and further discussion of these audits are described in their respective plans.

RG 1.58 Rev 1 - RG&E currently conforms to this regulatory guide without exception. The following exception is being requested:

- 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.

RG 1.144 Rev 1 - RG&E currently conforms to this regulatory guide without exception. The following exceptions are being requested:

1. Supplier Audits - Section C.3.b.(2) of Reg. Guide 1.144 Rev. 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.

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

RG 1.146 Rev 0 - RG&E currently conforms to this regulatory guide without exception. The following exception is being requested:

ATTACHMENT 1

Synopsis of Changes

- 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.

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

17.2.5 Procurement Verification

Revised requirement 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, Rev 1, Section C.3.b.(2).

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