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February 17, 2000

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 20, 1999.

b. Letter from G.S. Vissing, NRC, to R.C. Mecredy,
RG&E, Subject: "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. MA7874)," dated
January 27, 2000.

Dear Mr. Vissing:

In Revision 27 of QA Program for Station Operations (Reference
a), RG&E requested the following changes:

- Revise commitment to Regulatory Guide 1.33, Rev. 0 and ANSI N18.7-1972. These changes were made to eliminate conflicting requirements and to clarify substituted requirements for excepted sections.
- Eliminate the requirement for Quality Assurance personnel to perform an in-line review of procurement documents.

On January 27, 2000, the NRC requested additional information concerning these changes in Reference b. RG&E is modifying the changes requested in Reference a and is providing the additional information requested.

Q004

The modified changes are described in Attachment 1. Changes made to Revision 26 of the Quality Assurance Program for Station Operation are denoted by a single revision bar in the left margin in the Enclosure. Attachment 2 is a copy of the enclosure with changes highlighted or struck out.

Very truly yours,



Robert C. Mecredy

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Attachments 1 and 2

Enclosure: QA Program for Station Operation Revision 27

xc: U.S. Nuclear Regulatory Commission
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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

Item 1

In Reference a, RG&E requested the following change:

17.1 MANAGEMENT

17.1.2 Organization

Manager, Quality Assurance

Current Commitment

The last sentence of the first paragraph requires the following "Quality Assurance is 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 Quality Assurance personnel .

Requested Change

RG&E is requesting to remove this requirement to allow for the elimination of the review of procurement documents by Quality Assurance personnel.

Justification

The second sentence of Paragraph 7, of Section 17.2.4, Procurement Control states the following:

"In addition, a verification of proper inclusion of the quality standards, quality assurance program requirements, method of procurement, and the applicable acceptance criteria is performed."

This requirement will be implemented by having line personnel perform reviews of procurement documents for the above criteria. These line personnel will receive the appropriate training to perform these reviews. In addition, these reviews will be conducted in accordance with approved procedures.

Quality Assurance will assess the effectiveness of this process through a program of planned and periodic independent assessments conducted in accordance with Section 17.3.2, Assessments.

ATTACHMENT 1

Since the controls put in place provide reasonable assurance that the appropriate acceptance criteria are included in procurement documents, this change does not reduce the scope of the Quality Assurance Program.

In Reference b, the NRC provided the following response:

RG 1.123, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," Rev. 1, conditionally endorses ANSI N45.2.13-1976, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," as an acceptable method for complying with the requirements of Appendix B to 10 CFR Part 50 with regards to the control of procurement of items and services during the design, construction, and operations phases of a nuclear power plant. ANSI N45.2.13-1976 applies to "the work of any individual or organization participating in the procurement of those items and services from which satisfactory performance is required." ANSI N45.2.13-1976 also specifies that personnel performing verification activities be certified/qualified in accordance with ANSI N45.2.6, "Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants."

In your December 20, 1999, submittal you proposed to eliminate the requirement for Quality Assurance (QA) personnel to perform an in-line review of procurement documents. Your letter also states that in lieu of QA personnel, line organization personnel will perform reviews of procurement documents in accordance with approved procedures and that such personnel will be trained accordingly.

Please clarify and indicate 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.

ATTACHMENT 1

RG&E is providing the following response to the NRC's RAI:

Paragraph 7, of Section 17.2.4, Procurement Control is being revised to add the following clarification regarding the training and qualification of personnel performing procurement document reviews:

"Personnel performing these reviews shall be trained and qualified in accordance with the training programs discussed in Section 17.1.5."

Item 2

In Reference a, RG&E requested the following change:

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

Regulatory Guide 1.33, Rev. 0 - Change 1

Current Commitments

- RG&E commits to ANSI N18.7/ANS-3.2-1976 Section 4.3.1 for the offsite review function, excluding staffing.
- RG&E commits to ANSI/ANS-3.1-1987, Section 4.7 for the qualification requirements for NSARB members.

Requested Change

RG&E is requesting to eliminate the commitment to ANSI N18.7/ANS-3.2-1976 Section 4.3.1.

Justification for Change

This change is being made to eliminate a conflict in our commitments. The requirements of ANSI N18.7/ANS-3.2-1976 Section 4.3.1 and ANSI/ANS-3.1-1987, Section 4.7 both discuss the personnel to be assigned responsibility for independent review, and are redundant. Additionally, the "excluding staffing" qualifier appears to take exception to the requirements ANSI N18.7/ANS-3.2-1976 Section 4.3.1.

Since no significant differences exist between these two requirements, the elimination of one of the commitments will not reduce the scope of the Quality Assurance Program.

ATTACHMENT 1

In Reference b, the NRC provided the following response:

Table 17.1.7-1, "Conformance of Ginna Station Program to Quality Assurance Standards, Requirements, and Guides" — "Remarks" associated with Ginna's commitments to RG 1.33, Rev. 0, need to be clarified. For example, the text in "Substituted Criteria" does not currently reflect Ginna's proposed exception to the provisions in Section 4.3.1, "Personnel," of ANSI N18.7-1976. This table should reflect Ginna's proposal to use the provisions in ANSI/ANS-3.1-1987, Section 4.7, to define the qualification requirements for NSARB members in lieu of ANSI N18.7-1976, Section 4.3.1.

RG&E is providing the following response to the NRC's RAI:

The Remarks Section for Reg. Guide 1.33 was reformatted to provide better clarity as to what criteria had been substituted in place of excepted sections. However, the change created some confusion. The header for the "Requirements" column is being revised to read "Original Criteria" to better clarify how the criteria are being substituted.