December 5, 2001

Mr. Michael A. Krupa Director, Nuclear Safety and Licensing Entergy Operations, Inc. 1340 Echelon Parkway Jackson, MS 39213-8298

SUBJECT: ARKANSAS NUCLEAR ONE, UNITS 1 AND 2; GRAND GULF NUCLEAR

STATION, UNIT 1; RIVER BEND STATION; AND WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REVISION TO THE QUALITY ASSURANCE PROGRAM MANUAL (TAC NOS. MB3225, MB3226, MB3229, MB3230,

MB3232)

Dear Mr. Krupa:

By letter dated October 11, 2001, Entergy Operations, Inc. (Entergy) requested Nuclear Regulatory Commission (NRC) approval of a change to the Quality Assurance Program Manual (QAPM) for Arkansas Nuclear One, Units 1 and 2; Grand Gulf Nuclear Station, Unit 1; River Bend Station; and Waterford Steam Electric Station, Unit 3. The revision to Entergy's QAPM is submitted in accordance with the requirements of 10 CFR 50.54(a)(4) reflecting a change that reduced commitments in the QAPM description previously approved by the NRC.

The change deletes the Clarification/Exception Section C.9.a of QAPM Table 1, thereby allowing the On-site Safety Review Committee (the Committee) the flexibility to determine which procedures the Committee should review based on the procedure's importance and impact to nuclear safety, rather than on administrative classifications. The staff finds the change to the QAPM acceptable. The staff's safety evaluation is enclosed.

Sincerely,

/RA/

John L. Minns, Project Manager, Section 1 Project Directorate IV Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-313, 50-368, 50-416, 50-458, 50-382

Enclosure: Safety Evaluation

cc w/encls: See next page

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John L. Minns, Project Manager, Section 1 Project Directorate IV Division of Licensing Project Management Office of Nuclear Reactor Regulation

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cc w/encls: See next page

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County Judge of Pope County Pope County Courthouse Russellville, AR 72801

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION REVISION TO QUALITY ASSURANCE PROGRAM MANUAL

ARKANSAS NUCLEAR ONE, UNITS 1 AND 2; GRAND GULF NUCLEAR STATION, UNIT 1;

RIVER BEND STATION; AND WATERFORD STEAM ELECTRIC STATION, UNIT 3

ENTERGY OPERATIONS, INC.

DOCKET NOS. 50-313, 50-368, 50-416, 50-458, AND 50-382

1.0 <u>INTRODUCTION</u>

By letter dated October 11, 2001, Entergy Operations, Inc. (the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC) a request for change to the Quality Assurance Program Manual (QAPM) for Arkansas Nuclear One, Units 1 and 2; Grand Gulf Nuclear Station; River Bend Station; and Waterford Steam Electric Station, Unit 3. The requested change was submitted in accordance with the requirements of 10 CFR 50.54(a)(4) reflecting a change that reduced commitments in the QAPM description previously approved by the NRC.

2.0 BACKGROUND

Current Requirement:

QAPM Table 1, Section C.9 lists a specific Clarification/Exception to American National Standards Institute (ANSI) N18.7 Section 4.3.4, "Subjects Requiring Independent Review." Section C.9 states:

- "Examples of the matters reviewed by the on-site safety review committee [the Committee] in accordance with this section are the following:
- a. new and revised station administrative procedures and
- b. changes to the Emergency Plan (except editorial changes)."

Proposed Change:

Entergy Operations, Inc. proposes to delete Clarification/Exception Section C.9.a of QAPM Table 1, thereby allowing the on[-]site review committee the flexibility to determine which procedures the committee should review based on the procedure's importance and impact to nuclear safety.

3.0 EVALUATION

Section C.9.a of QAPM Table 1 currently contains a commitment for the Committee to review all new and revised station administrative procedures. The licensee proposed deleting this requirement to allow the Committee flexibility in determining which procedures they reviewed based on the procedure's importance and impact on nuclear safety rather than its classification as administrative.

Section 4.3.4(5) of ANSI N18.7-1976 as endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, allows a licensee's on-site safety review committee (the independent reviewer) to review matters involving safe operation of the nuclear power plant, which an independent reviewer deems appropriate for consideration, or which is referred to the independent reviewer by the on-site operating organization or by other functional organizational units within the owner organization. The Committee will determine which procedures to review based on the procedure's importance and impact on safety. Therefore, deleting the QAPM Clarification/Exception requiring the Committee to review station administrative procedures remains consistent with the intent of ANSI N18.7 Section 4.3.4(a), and is acceptable.

4.0 CONCLUSION

The staff has reviewed the proposed change to Section C.9.a of QAPM Table 1 described in the licensee's October 11, 2001, request, and concludes that it remains consistent with ANSI N18.7 guidance for subjects requiring independent review, and is, therefore, acceptable.

Principal Contributor: P. A. Balmain

Date: