



Entergy Nuclear South
1340 Echelon Parkway
Jackson, MS 39213
Tel 601 368 5670
gwilli1@entergy.com

George A. Williams
Vice President
Operations Support

April 25, 2002

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Entergy Quality Assurance Program Manual, Revision 7

CNRO-2002/00027

Ladies and Gentlemen:

Entergy Operations, Inc. is submitting the attached Quality Assurance Program Manual (QAPM), Revision 7 in accordance with 10CFR50.54(a)(3). Revision 7 is the current version in effect.

The QAPM, as revised, continues to satisfy the requirements of 10CFR50 Appendix B and the Regulatory Guides and ANSI Standards referenced in the QAPM Table of Contents and QAPM Attachment, Table 1.

I hereby certify to the best of my knowledge, information and belief, that the information provided herein accurately reflects changes made to the QAPM since the last annual submittal of April 23, 2001.

Should you have any questions, please contact Mr. Wenstrom Edge at (601) 368-5742.

Yours truly,

Jay K. Shayer
WEE PMG for GAW

GAW/WEE/WMG/ctp

attachments: (See Next Page)

cc: (See Next Page)

0004

attachments: A. Annual Submittal Introduction
B. QAPM Revision 50.54(a)(3) Change Review Forms/Marked up pages containing text changes
C. QAPM Revision 7

cc: Mr. C. G. Anderson (ANO), w/o
Mr. J. L. Blount (ECH), w/o
Mr. W.R. Campbell (ECH), w/o
Mr. W. A. Eaton (GGNS), w/o
Mr. P. D. Hinnenkamp (RBS), w/o
Mr. N. S. Reynolds, w/o
Mr. L. Jager Smith (Wise Carter), w/o
Mr. G. J. Taylor (ECH), w/o
Mr. J. K. Thayer (ECH), w/o
Mr. J. E. Venable (W-3), w/o

Mr. T. W. Alexion, Project Manager, ANO-2, w/A & B
Mr. R. L. Bywater, NRC Senior Resident Inspector, ANO, 2 w/A & B
Mr. R. T. Farnholtz, NRC Senior Resident Inspector, W3, w/A & B
Mr. T. L. Hoeg, NRC Senior Resident Inspector, GGNS, w/A & B
Mr. N. Kalyanam, Project Manager, W-3, w/A & B
Mr. E. W. Merschoff, NRC Regional Administrator, Region IV, w/A & B
Mr. P. J. Alter, NRC Senior Resident Inspector, RBS, w/A & B
Mr. W. D. Reckley, Project Manager, ANO-1, w/A & B
Mr. S. P. Sekerak, Project Manager, GGNS, w/A & B
Mr. D. J. Wrona, Project Manager, RBS, w/A & B

Attachment A

Entergy Quality Assurance Program Manual (QAPM) Annual Submittal Introduction

Annual QA Program Description Update:

In accordance with 10CFR50.54(a)(3) and 10CFR50.71(e)(4) the enclosed is the annual report of changes to our approved Quality Assurance Program Manual. The last annual submittal, dated April 23, 2001, encompassed QAPM Revision 4. Since that date we have incorporated Revision 5, 6, and 7 as described below and in the attached documentation.

Summary of QAPM Revisions:

Revision 5 was implemented September 13, 2001. The revision changed the reporting relationship of the offsite safety review committee by having the committee report directly to the chief operating officer. The change was determined not to involve a reduction in commitment and was implemented under 50.54(a)(3). See attached 50.54 Change Review Form and marked up QAPM page.

Revision 6 was implemented January 3, 2002 after obtaining NRC approval. The proposed change was considered a reduction in commitment and was submitted to the NRC by letter, CNRO-2001/00035, from Entergy dated October 11, 2001. NRC approval was received December 5, 2001. See attached marked up QAPM page that implemented the approved change.

Revision 7, the current revision, incorporates administrative changes necessary to support adoption of the Entergy Operations, Inc. (EOI) QAPM by the Entergy Nuclear Operations, Inc. (ENOI) division of Entergy. Entergy Nuclear Operations, Inc. intends to adopt the EOI QAPM in its entirety. Upon completion all current Entergy nuclear plants will have one manual. May 6, 2002 is the expected completion of this process. The addition of these changes has no impact on EOI QAPM requirements or implementation.

Brief description of changes:

- Added the Entergy Nuclear Operations, Inc. plants to the cover of the QAPM
- Added Entergy Nuclear Operations, Inc. to QAPM Section A.1
- Provided for differences in the reporting chain of executives.
- Deleted the list of organizations reporting to the manager responsible for plant operations to accommodate interim organization changes within Entergy Nuclear Operations, Inc.
- Added a clarification to Table 1 that provides a link between N18.7 and 10CFR50.59 terminology

10CFR50.54(a)(3) Change Review Forms and justification for changes are provided in Attachment B.

Attachment B

Contents:

QAPM 50.54(a)(3) Change Review Forms (description of change and justification)
Marked-up QAPM Pages Supporting Revisions 5, 6, and 7

Revision 5

Contents:

QAPM 50.54(a)(3) Change Review Form (description of change and justification)
Marked-up QAPM Page Supporting Revision 5



QUALITY ASSURANCE PROGRAM MANUAL
CHANGE REVIEW FORM
50.54.(a)(3)

PROPOSED CHANGE:

The offsite Safety Review Committees for the Entergy-Southwest sites currently report to the respective site Vice Presidents. (Refer to QAPM, Revision 4, Section A.2.d.1). This QAPM change moves that reporting relationship as indicated below.

A.2

- c. The chief operating officer reports to the president and is responsible for the implementation of all activities associated with the safe and reliable operation of Entergy's nuclear sites. The chief operating officer provides guidance with regards to company quality assurance policy and for incorporating alignment, consistency and synergy with the Entergy Nuclear – Northeast quality assurance policy. **The offsite safety review committee reports to the chief operating officer.**

- d. The following executives report to the chief operating officer:

1. The executive responsible for overall plant nuclear safety at each site is responsible for establishing the policies, goals, and objectives and the implementation of the quality assurance program at the respective site.

10CFR50.54 REVIEW:

- 1 Does the proposed change represent a reduction of commitment to the QA Program description previously accepted by the NRC, and has not been approved by the NRC for another Licensee? Yes No

Explain: No, this change is not a reduction in commitment. This change is an organizational alignment issue. The change places oversight of the Safety Review Committee at a higher management level and, therefore, does not diminish the management focus placed on the function and responsibility of the Safety Review Committee.

Regulatory Guide 1.33, Quality Assurance Program Requirements, and endorsed ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants, contains base requirements for independent review organizations. The guide and standard do not mandate organizational structure or reporting level of the off-site review body. Therefore, there is no regulatory restriction applicable to this proposed change.



2. Does the proposed change represent a reduction Yes No in commitment by EOI, but has been previously approved by the NRC for another Licensee; and does the SER issued by the NRC approving the other Licensee's change directly apply to EOI?

Explain:

This question is not applicable. The proposed change does not represent a reduction in commitment based on response to question 1. The proposed change is ENSW management direction and is specific to ENSW. Search for a previously approved SER for another utility is unnecessary.

3. If item 1 above is YES, does the proposed change include Yes No N/A the basis to conclude that the revised program incorporating the change continues to meet the criteria of 10CFR50, Appendix B and other previously accepted FSAR commitments?

Explain:

ATTACHMENT 9.1 PAGE 2 OF 2

QAPM CHANGE REVIEW FORM

10CFR50.54 REVIEW RESULTS:

- Does not represent a reduction of commitment, and can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment with prior NRC approval for another Licensee. The safety evaluation issued by the NRC has been evaluated and it directly applies to the changes being proposed for EOI. The change can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment, however, the change has sufficient basis to demonstrate continued compliance with Appendix B and FSAR commitments. Therefore, it should be submitted for NRC review/approval.
- Represents a reduction of commitment with insufficient basis to determine continued compliance. Therefore the change should not be processed.

Prepared By: W. M. Garner Date 6/21/01

10CFR50.54 REVIEW CONCURRENCE/APPROVAL:
Site and Corporate Managers, QA



ANO	Date
GGNS	Date
RB	Date
W-3	Date
ECH	Date

- Approved for implementation
 Disapproved
 Approved for submittal to the NRC

Approved by/Date: LD Puro / July 12, 2001
Director, Oversight



QUALITY ASSURANCE PROGRAM MANUAL

A.2 (continued)

- a. The chief executive officer is responsible for providing top level direction for the safe and reliable operation of Entergy's nuclear sites. The chief executive officer provides guidance with regards to company quality assurance policy.
- b. The president is responsible for overall strategy and direction in safely and reliably operating the regulated nuclear sites. The president provides guidance and interpretation for implementing the company quality assurance policy.
- c. The chief operating officer reports to the president and is responsible for the implementation of all activities associated with the safe and reliable operation of Entergy's nuclear sites. The chief operating officer provides guidance with regards to company quality assurance policy and for incorporating alignment, consistency and synergy with the Entergy Nuclear – Northeast quality assurance policy. **The offsite safety review committee reports to the chief operating officer.**
- d. The following executives report to the chief operating officer:
 1. The executive responsible for overall plant nuclear safety at each site is responsible for establishing the policies, goals, and objectives and the implementation of the quality assurance program at the respective site ~~and overseeing activities of the associated off-site safety review committee.~~
 2. The executive responsible for operations support is responsible for establishing the policies, goals, and objectives and the implementation of the quality assurance program of Entergy's corporate activities and maintaining this QAPM in accordance with regulatory requirements.
 3. The executive responsible for engineering is responsible for providing engineering services.
- e. The individuals fulfilling the following management functions report to the executives identified above. These individuals may report through an additional layer of management but shall maintain sufficient authority and organizational freedom to implement the assigned responsibilities. These individuals may be responsible for a single unit/location or for multiple units/locations and may fulfill more than one function described below:

Revision 6

Contents:

Marked-up QAPM Page Supporting Revision 6

Table 1
Regulatory Commitments

C. Regulatory Guide 1.33 (continued)

Clarification/Exception

- | | | |
|-----|--------------------------------|---|
| 7. | ANSI N18.7
Section 4.3.4(3) | Revision to proposed Technical Specification changes only require review in accordance with this section when the revision involves a significant change to the technical basis for the proposed change. |
| 8. | ANSI N18.7
Section 4.3.4(4) | In place of the requirements of this section, the on-site and off-site safety review committees shall review facility operations to detect potential nuclear safety hazards and all reports made in accordance with 10 CFR 50.73. |
| 9. | ANSI N18.7
Section 4.3.4(5) | <p>An eExamples of the matters reviewed by the on-site safety review committee in accordance with this section is are the following:</p> <ul style="list-style-type: none">a. new and revised station administrative procedures andb. changes to the Emergency Plan (except editorial changes). |
| 10. | ANSI N18.7
Section 4.5 | This section establishes minimum 2 year audit frequency for all safety related functions. Entergy will perform audits at frequencies as discussed in QAPM Section C.2.a instead of this section. |
| 11. | ANSI N18.7
Section 4.5 | The independent review body discussed in this section is the off-site safety review committee. |
| 12. | ANSI N18.7
Section 5.1 | Instead of the requirements of this section to have a summary document, a method of cross referencing these requirements to the implementing procedures will be maintained. |
| 13. | ANSI N18.7
Section 5.2.2 | The person who holds a senior reactor operators license for the affected unit and approves a temporary change to a procedure is not required to be in charge of the shift. |

Revision 7

Contents:

QAPM 50.54(a)(3) Change Review Forms (description of change and justification)
Marked-up QAPM Pages Supporting Revision 7

NOTES

1. In the attached 50.54 ENS stands for Entergy Nuclear South and ENN stands for Entergy Nuclear Northeast. These are company divisional names only.
2. The FENOC QAPM safety evaluation, referenced in one of the attached 50.54 change review forms, is not included as an attached to this submittal.

QUALITY ASSURANCE PROGRAM MANUAL CHANGE REVIEW FORM 50.54.(a)(3)	
<p>PROPOSED CHANGE: See attached markup of the QAPM for all proposed changes. This change consists of adding the Entergy Northeast plants names, license numbers, and docket numbers to the QAPM cover and adding Entergy Nuclear Operations, Inc. to QAPM Section A.1, Methodology. This change is in support of the adoption of the EOI QAPM by Entergy Nuclear Operations, Inc.</p>	
<p>10CFR50.54 REVIEW:</p>	
1	<p>Does the proposed change represent a reduction of commitment to the QA Program description previously accepted by the NRC, and has not been approved by the NRC for another Licensee? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><i>Explain:</i> Explain: This proposed change does not represent a reduction in commitment. This proposed change is administrative only and does not reduce any commitment made by EOI. This change supports Entergy's move toward having a single QA manual for all currently owned nuclear power plants.</p>
2.	<p>Does the proposed change represent a reduction in commitment by EOI, but has been previously approved by the NRC for another Licensee; and does the SER issued by the NRC approving the other Licensee's change directly apply to EOI? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><i>Explain:</i> Explain: This proposed change is administrative only and does not represent a reduction in commitment</p>
3.	<p>If item 1 above is YES, does the proposed change include the basis to conclude that the revised program incorporating the change continues to meet the criteria of 10CFR50, Appendix B and other previously accepted FSAR commitments? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> <p><i>Explain:</i></p>



10CFR50.54 REVIEW RESULTS:

- Does not represent a reduction of commitment, and can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment with prior NRC approval for another Licensee. The safety evaluation issued by the NRC has been evaluated and it directly applies to the changes being proposed for EOI. The change can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment, however, the change has sufficient basis to demonstrate continued compliance with Appendix B and FSAR commitments. Therefore, it should be submitted for NRC review/approval.
- Represents a reduction of commitment with insufficient basis to determine continued compliance. Therefore the change should not be processed.

Prepared By: W. M. Garner Date March 25, 2002

10CFR50.54 REVIEW CONCURRENCE/APPROVAL:
Site and Corporate Managers, QA

ANO

Date

4/12/02

GGNS

Date

RB

Date

W-3

Date

ECH

Date

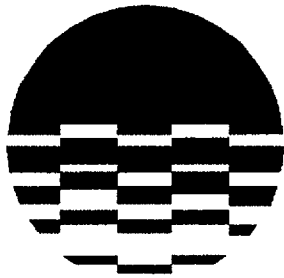
4/15/02

- Approved for implementation
- Disapproved
- Approved for submittal to the NRC

Approved by/Date:

Director, Oversight

4/17/2002



Entergy

Quality Assurance Program Manual

**Arkansas Nuclear One
Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6**

**Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29**

**River Bend Station
Docket No. 50-458
License No. NPF-47**

**Waterford 3 Steam Electric Station
Docket No. 50-382
License No. NPF-38**

**Indian Point 1 Nuclear Power Plant
Docket No. 50-003
License Number DRP-05**

**Indian Point 2 Nuclear Power Plant
Docket No. 50-247
License No. DRP-26**

**Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DRP-64**

**Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DRP-35**

**James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DRP-59**



A. MANAGEMENT

1. Methodology

- a. The Quality Assurance Program Manual (QAPM) provides a consolidated overview of the quality program controls which govern the operation and maintenance of **Entergy's (Entergy Operations, Inc.'s (EOI) and Entergy Nuclear Operations, Inc. (ENOI))** quality related items and activities. The QAPM describes the quality assurance organizational structure, functional responsibilities, levels of authority, and interfaces.
- b. The requirements and commitments contained in the QAPM are mandatory and must be implemented, enforced, and adhered to by all individuals and organizations. Employees are encouraged to actively participate in the continued development of the QAPM as well as its implementation. Changes should be promptly communicated when identified.
- c. The QAPM applies to all activities associated with structures, systems, and components which are safety related or controlled by 10 CFR 72. The QAPM also applies to transportation packages controlled by 10 CFR 71. The methods of implementation of the requirements of the QAPM are commensurate with the item's or activity's importance to safety. The applicability of the requirements of the QAPM to other items and activities is determined on a case-by-case basis. The QAPM implements 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G.
- d. The QAPM is implemented through the use of approved procedures (i.e., policies, directives, procedures, instructions, or other documents) which provide written guidance for the control of quality related activities and provide for the development of documentation to provide objective evidence of compliance.

2. Organization

The organizational structure responsible for implementation of the QAPM is described below. The specific organization titles for the quality assurance functions described are identified in procedures. The authority to accomplish the quality assurance functions described is delegated to the incumbent's staff as necessary to fulfill the identified responsibility.



QUALITY ASSURANCE PROGRAM MANUAL
CHANGE REVIEW FORM
50.54.(a)(3)

PROPOSED CHANGE: See attached markup, section A.2, of the QAPM for all proposed changes. This change consists of providing for reporting relationship differences between EOI (ENS) and ENOI (ENN) at the executive level. This change is necessary to accommodate use of a single QA manual for all currently owned nuclear power plants while accommodating differences in executive management chains. These differences are administrative and have no impact on the implementation of the QAPM.

10CFR50.54 REVIEW:

- 1 Does the proposed change represent a reduction of commitment to the QA Program description previously accepted by the NRC, and has not been approved by the NRC for another Licensee? Yes No

Explain:

Explain:

This change is administrative in nature and has no impact on the functional responsibilities or requirements specified in the QAPM.

2. Does the proposed change represent a reduction in commitment by EOI, but has been previously approved by the NRC for another Licensee; and does the SER, issued by the NRC approving the other Licensee's change, directly apply to EOI? Yes No

Explain:

Explain:

The proposed change is not a reduction in commitment. Screening criteria of question 2 is not applicable.

3. If item 1 above is YES, does the proposed change include the basis to conclude that the revised program incorporating the change continues to meet the criteria of 10CFR50, Appendix B and other previously accepted FSAR commitments? Yes No N/A

Explain:



10CFR50.54 REVIEW RESULTS:

- Does not represent a reduction of commitment, and can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment with prior NRC approval for another Licensee. The safety evaluation issued by the NRC has been evaluated and it directly applies to the changes being proposed for EOI. The change can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment, however, the change has sufficient basis to demonstrate continued compliance with Appendix B and FSAR commitments. Therefore, it should be submitted for NRC review/approval.
- Represents a reduction of commitment with insufficient basis to determine continued compliance. Therefore the change should not be processed.

Prepared By: W. M. Garner Date March 25, 2002

10CFR50.54 REVIEW CONCURRENCE/APPROVAL:

Site and Corporate Managers, QA

ANO

Date

4/12/02

GGNS

Date

RB

Date

W-3

Date

ECH

Date

4/15/02

Approved for implementation

Disapproved

Approved for submittal to the NRC

Approved by/Date:

Director, Oversight

4/17/2002



QUALITY ASSURANCE PROGRAM MANUAL

A.2 (continued)

- a. The chief executive officer is responsible for providing top level direction for the safe and reliable operation of Entergy's nuclear sites. The chief executive officer provides guidance with regards to company quality assurance policy.
- b. The president is responsible for overall strategy and direction in safely and reliably operating the regulated nuclear sites. The president provides guidance and interpretation for implementing the company quality assurance policy. **This position is applicable to Entergy Operations, Inc. only.**
- c. **Within EOI** ~~the chief operating officer reports to the president and within ENOI the chief operating officer reports to the chief executive officer. And~~ **The chief operating officer** is responsible for the implementation of all activities associated with the safe and reliable operation of Entergy's nuclear sites. The chief operating officer provides guidance with regards to company quality assurance policy ~~and for incorporating alignment, consistency and synergy with the Entergy Nuclear—Northeast quality assurance policy.~~ The offsite safety review committee reports to the chief operating officer.
- d. The following executives report to the chief operating officer:
 1. The executive responsible for overall plant nuclear safety at each site is responsible for establishing the policies, goals, and objectives and the implementation of the quality assurance program at the respective site.
 2. The executive responsible for operations support is responsible for establishing the policies, goals, and objectives and the implementation of the quality assurance program of Entergy's corporate activities and maintaining this QAPM in accordance with regulatory requirements.
 3. The executive responsible for engineering is responsible for providing engineering services.
- e. The individuals fulfilling the following management functions report to the executives identified above. These individuals may report through an additional layer of management but shall maintain sufficient authority and organizational freedom to implement the assigned responsibilities. These individuals may be responsible for a single unit/location or for multiple units/locations and may fulfill more than one function described below:



QUALITY ASSURANCE PROGRAM MANUAL
CHANGE REVIEW FORM
50.54.(a)(3)

PROPOSED CHANGE:

Currently, the EOI QAPM, Revision 6, Section A.2.e.2 lists functional responsibilities (departments) that report to the manager responsible for plant operations. The list provides no functional detail.

The proposed change will delete the list of functional responsibilities under this manager. One item in the list, i.e. onsite safety review committee, will be moved into the functional description of the manager responsible for plant operations.

This change is in support of having one QAPM for all current Entergy nuclear power plants. It would also accommodate plant differences due to interim organizational structure and executive management discretion.

Basis for change:

This proposed change falls under 10 CFR 50.54(a)(3)(ii): "The use of a quality assurance alternative or exception approved by an NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility."

FirstEnergy Nuclear Operating Company (FENOC) patterned a proposed revision to their QA program description after EOI's single QA manual. FENOC submitted a request for a safety evaluation of their proposed QAPM to the NRC in December of 2000. The NRC provided their approval in a letter dated August 17, 2001 and was accompanied with their safety evaluation (see attached).

Specifically, the paragraph in the FENOC's approved QAPM, Revision 1, stated: "The individual responsible for plant operations assures the safe, reliable, and efficient operation of the plant within the constraints of applicable regulatory requirements and the operating license." No list of departments reporting to this position were provided.

Whereas the current EOI QAPM states: "The manager responsible for plant operations assures the safe, reliable, and efficient operation of the plant within the constraints of the applicable regulatory requirements and the operating license." This part is followed by the list: "chemistry, operations, maintenance, radiological protection, implementation of design activities, work control, tests, on-site safety review committee, and maintenance of the plant in conformance with approved design."

See marked up proposed change.

10CFR50.54 REVIEW:

- 1 Does the proposed change represent a reduction of commitment to the QA Program description previously accepted by the NRC, and has not been approved by the NRC for another Licensee? Yes No

Explain:

Explain:

The changed does not represent a reduction in commitment in regards to functional descriptions because the management function remains in-tact. The list being deleted does not provide functional description



detail.

2. Does the proposed change represent a reduction in commitment by EOI, but has been previously approved by the NRC for another Licensee; and does the SER issued by the NRC approving the other Licensee's change directly apply to EOI? Yes No

Explain:

The proposed change is considered a reduction in level of detail only. The functional responsibility of the manager responsible for plant operations remains unchanged. The proposed change invokes 10 CFR 50.54(a)(3), as supported by the FENOC approved SER, and concludes that the proposed change to the EOI QAPM is acceptable, can be implemented upon EOI approval, and does not require prior NRC approval.

3. If item 1 above is YES, does the proposed change include the basis to conclude that the revised program incorporating the change continues to meet the criteria of 10CFR50, Appendix B and other previously accepted FSAR commitments? Yes No N/A

Explain:

*note: This page is extended due to
printer configuration. See next page.*

*K.M. Garner
4/17/2002*



10CFR50.54 REVIEW RESULTS:

- Does not represent a reduction of commitment, and can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment with prior NRC approval for another Licensee. The safety evaluation issued by the NRC has been evaluated and it directly applies to the changes being proposed for EOI. The change can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment, however, the change has sufficient basis to demonstrate continued compliance with Appendix B and FSAR commitments. Therefore, it should be submitted for NRC review/approval.
- Represents a reduction of commitment with insufficient basis to determine continued compliance. Therefore the change should not be processed.

Prepared By: W. M. Garner Date April 4, 2002

10CFR50.54 REVIEW CONCURRENCE/APPROVAL:

Site and Corporate Managers, QA

ANO

Date

4/12/02

GGNS

Date

RB

Date

W-3

Date

ECH

Date

4/15/02

Approved for implementation

Disapproved

Approved for submittal to the NRC

Approved by/Date:

Director, Oversight

4/17/2002



QUALITY ASSURANCE PROGRAM MANUAL

A.2.e (continued)

1. The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the quality assurance program as described in this QAPM including activities related to vendor quality. The manager responsible for quality assurance has the authority and responsibility to escalate matters directly to the chief executive officer when needed.
2. The manager responsible for **overall** plant operations assures the safe, reliable, and efficient operation of the plant within the constraints of applicable regulatory requirements and the operating license. **The onsite safety review committee reports to the manager responsible for plant operations.** ~~The functional responsibility includes:~~
 - a. ~~chemistry,~~
 - b. ~~operations,~~
 - c. ~~maintenance,~~
 - d. ~~radiological protection,~~
 - e. ~~implementation of design activities,~~
 - f. ~~work control,~~
 - g. ~~tests,~~
 - h. ~~on-site safety review committee, and~~
 - i. ~~maintenance of the plant in conformance with approved design.~~
3. The manager responsible for plant modification provides direction, control, and overall supervision of the implementation of plant modifications and assigned maintenance. Separate managers may be responsible for different modification activities.
4. The manager responsible for training provides direction, control, and overall supervision of all training of personnel required by regulations.
5. The manager responsible for records management provides direction, control, and overall supervision of the records management program and associated activities.
6. The manager responsible for document control provides direction, control, and overall supervision of the document control program and associated activities.
7. The manager responsible for the corrective action program provides direction, control, and overall supervision of the corrective action program and associated activities.



QUALITY ASSURANCE PROGRAM MANUAL
CHANGE REVIEW FORM
50.54.(a)(3)

PROPOSED CHANGE: See attached marked up QAPM Table.

This change provides a clarification to Table 1, Section C. through the addition of the following:

10 CFR 50.59 was revised through Federal Register Notice 19991001 R1N3150-AF94 eliminating the terms "safety evaluation" and "unreviewed safety question". The term "safety evaluation" has been replaced with 10 CFR 50.59 "evaluation". The term "unreviewed safety question", as defined in the previous version of 10 CFR 50.59 (a)(2), was replaced by criteria provided in 50.59(c)(2) to determine if a license amendment pursuant to 50.90 is required prior to implementing the change, test, or experiment.

Reason for the change:

ANSI N18.7-1976, Section 4.3.4, titled Subjects Requiring Independent Review, contains the original 10 CFR 50.59 terms. This change will provide a reference linking the current 50.59 terminology with the ANSI.

10CFR50.54 REVIEW:

- 1 Does the proposed change represent a reduction of commitment to the QA Program description previously accepted by the NRC, and has not been approved by the NRC for another Licensee? Yes No

Explain:

Explain:

The change is administrative in nature and provides additional information in the QAPM Table tying and clarifying the connection between 10 CFR 50.59 and ANSI N18.7-1976.

2. Does the proposed change represent a reduction in commitment by EOI, but has been previously approved by the NRC for another Licensee; and does the SER issued by the NRC approving the other Licensee's change directly apply to EOI? Yes No

Explain:

Explain:

The criteria of question 2 does not apply.

3. If item 1 above is YES, does the proposed change include the basis to conclude that the revised program incorporating the change continues to meet the criteria of 10CFR50, Appendix B and other previously accepted FSAR commitments? Yes No N/A

Explain:



10CFR50.54 REVIEW RESULTS:

- Does not represent a reduction of commitment, and can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment with prior NRC approval for another Licensee. The safety evaluation issued by the NRC has been evaluated and it directly applies to the changes being proposed for EOI. The change can be implemented upon Director, Oversight approval.
- Represents a reduction of commitment, however, the change has sufficient basis to demonstrate continued compliance with Appendix B and FSAR commitments. Therefore, it should be submitted for NRC review/approval.
- Represents a reduction of commitment with insufficient basis to determine continued compliance. Therefore the change should not be processed.

Prepared By: W. M. Gamer Date March 25, 2002

10CFR50.54 REVIEW CONCURRENCE/APPROVAL:

Site and Corporate Managers QA

ANO

Date

4/12/02

GGNS

Date

RB

Date

W-3

Date

ECH

Date

4/15/02

- Approved for implementation
- Disapproved
- Approved for submittal to the NRC

Approved by/Date:

Director, Oversight

4/17/2002

Table 1
Regulatory Commitments

6.	ANSI N18.7 Section 4.3.4.(1) & (2)	10 CFR 50.59 was revised through Federal Register Notice 19991001 R1N3150-AF94 eliminating the terms "safety evaluation" and "unreviewed safety question". The term "safety evaluation" has been replaced with 10 CFR 50.59 "evaluation". The term "unreviewed safety question", as defined in the previous version of 10 CFR 50.59 (a)(2), was replaced by criteria provided in 50.59(c)(2) to determine if a license amendment pursuant to 50.90 is required prior to implementing the change, test, or experiment.
67.	ANSI N18.7 Section 4.3.4(2)	Reviews associated with changes to the technical specifications will be performed in accordance with Section 4.3.4(3) instead of this section.
78.	ANSI N18.7 Section 4.3.4(3)	Revision to proposed Technical Specification changes only require review in accordance with this section when the revision involves a significant change to the technical basis for the proposed change.
89.	ANSI N18.7 Section 4.3.4(4)	In place of the requirements of this section, the on-site and off-site safety review committees shall review facility operations to detect potential nuclear safety hazards and all reports made in accordance with 10 CFR 50.73.
910.	ANSI N18.7 Section 4.3.4(5)	An example of the matters reviewed by the on-site safety review committee in accordance with this section is change to the Emergency Plan (except editorial changes).
4011.	ANSI N18.7 Section 4.5	This section establishes minimum 2 year audit frequency for all safety related functions. Entergy will perform audits at frequencies as discussed in QAPM Section C.2.a instead of this section.
4412.	ANSI N18.7 Section 4.5	The independent review body discussed in this section is the off-site safety review committee.
4213.	ANSI N18.7 Section 5.1	Instead of the requirements of this section to have a summary document, a method of cross referencing these requirements to the implementing procedures will be maintained.
4314.	ANSI N18.7 Section 5.2.2	The person who holds a senior reactor operators license for the affected unit and approves a temporary change to a procedure is not required to be in charge of the shift.



Table 1
Regulatory Commitments

1415.	ANSI N18.7 Section 5.2.2	In addition to the temporary procedure change process described for changes which clearly do not change the intent of a procedure, temporary procedure changes which may change the intent of a procedure may be made following the process described in this section. Except that the person normally responsible for approving revisions to the procedure is the approval authority for the change.
1516.	ANSI N18.7 Section 5.2.6	Instead of the requirements of this section concerning non-conforming conditions, non-conforming conditions will be evaluated and controlled in accordance with the corrective action program.



**Table 1
Regulatory Commitments**

C. Regulatory Guide 1.33 (continued)

Clarification/Exception

4617.	ANSI N18.7 Section 5.2.6	The requirement of the fifth paragraph of this section to have a log of the status of temporary modifications is not applicable to temporary modifications for routine tasks installed in accordance with procedures. These procedures shall provide assurance that approvals are obtained, temporary modification activities are independently verified by an individual cognizant of the purpose and the effect of the temporary modification, and that activities are adequately documented to indicate the status of the temporary modification.
4718.	ANSI N18.7 Section 5.2.7.1	This section will be implemented by adding the words "Where practical" in front of the first and fourth sentences of the fifth paragraph. For modifications where the requirements of the fourth sentence are not considered practical, a review in accordance with the provisions of 10 CFR 50.59 will be conducted.
4819.	ANSI N18.7 Section 5.2.8	In lieu of a "master surveillance schedule," the following requirement shall be complied with: "A surveillance testing schedule(s) shall be established reflecting the status of all in-plant surveillance tests and inspections."
4920.	ANSI N18.7 Section 5.2.9	The requirements of the Physical Security Plan shall be implemented in place of these general requirements.
2021.	ANSI N18.7 Section 5.2.13.1	Consistent with ANSI N45.2.11 Section 7.2, minor changes to documents, such as inconsequential editorial corrections, or changes to commercial terms and conditions may not require that the revised document receive the same review and approval as the original documents.
2422.	ANSI N18.7 Section 5.2.14	Where marking, tagging, or physical separation of the non-conforming item is not feasible, the non-conforming item may be controlled by the use of appropriate documentation.



**Table 1
Regulatory Commitments**

C. Regulatory Guide 1.33 (continued)

Clarification/Exception

2223.	ANSI N18.7 Section 5.2.15	Required procedure reviews following the occurrences discussed in Section 5.2.15, paragraph 3, sentence 3, are determined and controlled in accordance with the QAPM Section A.6 instead of this section.
2324.	ANSI N18.7 Section 5.2.15	This section requires plant procedure review by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. Instead of this review, controls are in effect to ensure that procedures are reviewed for possible revision upon identification of new or revised source material potentially affecting the intent of procedures.
2425.	ANSI N18.7 Section 5.3.9	Instead of the requirements of this section, the format and content of the emergency operating procedures follow the applicable NRC approved format for the specific unit.
2526.	ANSI N18.7 Section 5.3.9.3	Entergy's NRC accepted Emergency Plan will be implemented in lieu of the requirements in this section.