



Entergy Nuclear Potomac Company
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August 15, 2002

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555
Attention: James E. Lyons

Reference: (1) Entergy Early Site Permit Project - NRC Project No. 720
(2) Letter from Ronald Simard (NEI) to James Lyons (NRC) dated May 20, 2002
(3) Letter from James Lyons (NRC) to Doug Walters (NEI) dated February 22, 2002

Subject: Quality Processes for Preparing the Entergy Early Site Permit Application

CNRO-2002/00046

Dear Mr. Lyons:

This letter transmits the Quality Assurance Project Planning Document (QAPPD) that Entergy Nuclear Potomac and its contractors are using in preparing an Early Site Permit (ESP) application for the site on which Grand Gulf Nuclear Station is also located. In a June 13, 2002, meeting with the NRC Staff, Entergy Nuclear Potomac committed to submit the QAPPD to the NRC and to specify the level of NRC review to be applied to the QAPPD. As explained below, Entergy Nuclear Potomac is not seeking formal NRC review and approval of the QAPPD. Rather, it herein requests that the NRC provide feedback on the QAPPD and confirm that an application prepared under its controls would achieve the requisite level of quality necessary for ESP applications submitted in accordance with 10 CFR Part 52.

Background

By way of background, the NRC Staff discussed quality assurance of ESP activities with the Nuclear Energy Institute (NEI) and documented a pre-application inspection plan in a February 22, 2002, letter to NEI (Reference 3). In response, NEI submitted an issue paper on Topic ESP-3, "QA Requirements of ESP Information," outlining the industry's approach regarding the application of quality assurance programs and processes to the preparation of ESP applications (Reference 2). Entergy Nuclear Potomac endorses the NEI ESP-3 issue paper as an accurate reflection of the company's plans for applying quality assurance (QA) to the preparation of the ESP application.

Quality Assurance Plan for ESP

To establish a QA plan for its ESP, Entergy Nuclear Potomac selected a primary vendor (Enercon Services, Inc.) qualified in accordance with the Entergy Quality Assurance Program Manual (QAPM) to perform safety-related work for Entergy in accordance with its own QA Program and procedures.¹ Enercon prepared the QAPPD that is being used for applicable portions of the ESP application development, as described in the document. Secondary vendors and subcontractors, such as the company providing technical support relating to evaluation of seismic hazards, are subject to Enercon's QA Program and QAPPD. These subcontractors have been or will be trained on the QAPPD and implementing procedures.

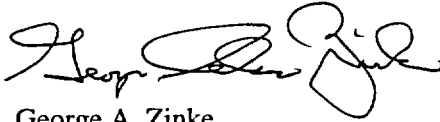
The Enercon QAPPD establishes the overall quality framework for the Entergy ESP Project. The QAPPD defines the scope of ESP activities to which quality assurance requirements will be applied, roles and responsibilities for implementing the quality assurance requirements, requirements for project records and training, and methods that will be used to implement the quality assurance requirements. The latter methods include project instructions, prepared to address specific aspects of the ESP application development project (e.g., hydrological and meteorological data management), and more generic Corporate Standard Procedures maintained by Enercon to control generic activities such as preparation of calculations, software control, and quality assurance training conducted in accordance with the Enercon QA Program.

Enclosed is a copy of the QAPPD, along with four project instructions (included as attachments to the QAPPD), which provide more detailed guidance for performing selected portions of the ESP work to be completed under the quality assurance requirements. While not seeking NRC approval of the QAPPD, it is submitted to the Staff for review and feedback in advance of the formal submittal of Entergy's ESP application next year, as committed in the June 13, 2002, meeting of the ESP Task Force with the NRC Staff. In particular, Entergy Nuclear Potomac requests that the NRC provide it with feedback on the QAPPD and confirm that an application prepared under its controls would achieve the requisite level of quality necessary for ESP applications submitted in accordance with 10 CFR Part 52. Since we are currently using the QAPPD in preparation of the ESP application, we request that the Staff provide this feedback by September 30, 2002.

We appreciate the NRC Staff's interest in, and support of, the NEI ESP Task Force's efforts to address regulatory issues relating to development of ESP applications on a generic basis. We look forward to working closely with the NRC Staff during development of our ESP application, and during the NRC Staff's formal review of the resulting ESP application in calendar year 2003. Please contact me if you need any additional information regarding this material.

¹ Entergy Nuclear Potomac is a separate entity from Entergy Operations, Inc., the operating company for Grand Gulf Nuclear Station. While both companies are subsidiaries of Entergy Corporation (Entergy), each is subject to different regulatory and financial rules. Accordingly, regulatory bodies (e.g., SEC and state regulatory agencies) that govern operation of Entergy's operating plants and their associated companies preclude the use of quality assurance procedures, programs, processes and resources by Entergy Nuclear Potomac in preparation of the ESP application. Further, the Entergy QAPM and implementing procedures are written specifically for operation of Entergy's operating nuclear power plants and address those activities that may affect safety-related systems, structures and components that are necessary for safe operation of its nuclear power plants. These programs and procedures do not address the kinds of activities to be completed for siting and site characterization studies for possible future nuclear power plants. Entergy Nuclear Potomac, therefore, will rely on a qualified vendor's QA Program because it is currently precluded from directly using the Entergy QAPM for preparing the ESP application.

Yours very truly,



George A. Zinke
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GAZ

attachment: Enercon Services, Inc. Quality Assurance Project Planning Document Rev. 2

cc:

Bell	R.J.	(NEI)	w/o
Bourgeois	M.D.		w/o
Campbell	P.L.	(Winston & Strawn)	w/o
Cesare	G.	(Enercon)	w/o
Edge	W.E.		w/o
Evans	R.	(Enercon)	w/o
Hughey	W.K.		w/o
Jenkins	R.V.	(NRC-NRR/ADIP/NRLPO)	w/a
Krupa	M.A.		w/o
Paulk	C.J.	(NRC-RIV)	w/a
Roberts	J.C.	(EOI-GGNS)	w/o
Schneider	A.	(Enercon)	w/o
Corporate File			(3)