
Entergy Fleet LAR Pre-submittal Meeting

Changes to TSs and QA Program Manual
for Unit Staff Qualifications

LAR Purpose

- Eliminate staff qualification disparities between fleet QAPM and unit Tech Specs.
 - NRC inspection concern
- Standardize qualification requirements for the fleet.
- Allow flexibility in QA manager selection per SRP 17.5.

Scope of Changes

- Elimination of TS/QAPM Disparities
 - Current Fleet QAPM
 - ANSI/ANS 3.1-1978
 - Exceptions specified in unit's Tech Specs and QAPM
 - Current Site Tech Specs
 - ANSI/ANS 3.1-1978 with exceptions
 - ANSI/ANS 3.1-1978 except as clarified in QAPM (GG)
 - ANSI N18.1-1971
 - Combination of Both
 - Special Qualifications
 - Proposal: Specify ANSI/ANS 3.1-1978 in each unit's TS with exceptions specified in QAPM.

Scope of Changes

- Fleet Standardization
 - Radiation Protection Manager
 - RG 1.8, 1975 (most of the fleet)
 - RG 1.8, 1987 (Grand Gulf)
 - Proposal: Make RG 1.8, 1987 the fleet standard.
 - Shift Technical Advisor
 - Commission Policy Statement (most of the fleet)
 - RG 1.8, 1987 (Grand Gulf)
 - Proposal: Make RG 1.8, 1987 the fleet standard.
- Use of improved STS generic wording as appropriate.

Scope of Changes

- QA manager qualifications
 - QAPM revised to take exception to ANSI/ANS 3.1-1978 to allow QA manager to be qualified per SRP 17.5

Proposed TS Changes

- STA

- ~~The Shift Technical Advisor (STA)~~ **When in MODES 1, 2, or 3 [MODES 1, 2, 3, or 4 for PWRs] an individual** shall provide advisory technical support to the ~~shift superintendent~~ **unit operations shift crew** in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. ~~In addition, the STA~~ **This individual** shall meet the qualifications specified by ~~the Commission Policy Statement on Engineering Expertise on Shift.~~ **Regulatory Guide 1.8, Revision 2, 1987.**

Proposed TS Changes

■ Unit Staff

- Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, ~~except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.~~ **with exceptions specified in the Entergy Quality Assurance Program Manual (QAPM).**
- **For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m).**

Proposed QAPM Changes

RG 1.8 Rev. 1 Clarifications/Exceptions

- **Entergy is committed to Sections 1 – 4 of ANSI/ANS 3.1 1978 with following clarifications and exceptions for non-licensed qualifications.**
- ~~Qualification requirements for personnel, other than Licensed Operators covered under 10CFR55, shall meet ANSI/ANS 3.1 1978 except for positions where an exception to either ANSI/ANS 3.1-1978 or N18.1-1971 is stated in the applicable unit's Technical Specifications. If an exception exists for a given position, the applicable unit's Technical Specification qualification requirements shall apply.~~ **the following:**
 - a. **The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2, 1987.**
 - b. **Managers required to hold an SRO license are those specified in the applicable unit's Technical Specifications.**
 - c. **Licensed Operators shall be qualified in accordance with the requirements of 10 CFR 55.**

Proposed QAPM Changes

RG 1.8 Rev. 1 Clarifications/Exceptions (continued)

- **ANSI/ANS 3.1 Section 4.4: Individuals assigned to professional-technical comparable positions shall have the authority and specified qualifications to accomplish the functional responsibilities of the position.**
- **ANSI/ANS 3.1 Section 4.4.4: Individuals who do not possess the formal education and minimum experience requirements for the individual responsible for quality assurance should not be eliminated automatically when other factors provide sufficient demonstration of their abilities. These other factors are evaluated on a case-by-case basis and approved and documented by senior management.**

LAR Submittal

- Fleet submittal with TS and QAPM changes.
 - One letter
 - 2 enclosures (QAPM & TS) with attachments
- Submit Spring 2011.
- Request one year approval.
- Implementation within 120 days.

Summary

- The proposed TS and QAPM changes:
 - Resolve disparities between unit TS and fleet QAPM.
 - Allow for fleet standardization
 - Raises the fleet qualifications for RPM and STA to current Grand Gulf requirements.
 - Allows exceptions to be specified in QAPM per current GGNS precedent.
 - Uses Improved STS wording as appropriate.
 - Provides flexibility in QA manager selection.