



**Entergy
Operations**

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November 16, 1990

OCAN119005

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Generic Letter 90-03

Gentlemen:

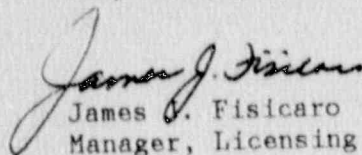
On April 10, 1990 Entergy Operations received Generic Letter 90-03 entitled Relaxation of Staff Position in Generic Letter 83-28, Item 2.2. Part 2 "Vendor Interface for Safety Related Components" (OCNA039028). As discussed in ANO letter dated October 3, 1990 (OCAN109012), Entergy Operations requested an extension for response until November 16, 1990.

The Entergy Operations response to Generic Letter 90-03 for ANO is provided in the attachment to this letter. As discussed in this attachment, Entergy Operations at ANO had previously committed to a program which was considered by the NRC in letter dated December 13, 1988 (OCNA128813) to be acceptable for meeting Generic Letter 83-28 item 2.2.2 pending completion of certain agreed upon actions. Therefore, our response to Generic Letter 90-03 is based on our compliance with these previously identified actions. However, this response also addresses the other considerations discussed in Generic Letter 90-03.

Therefore, based on the ANO program described in the attachment to this letter, Entergy Operations confirms that we have examined the ANO vendor interface program and that it meets the elements set out in Generic Letter 90-03. This information is being provided under affirmation pursuant to 10CFR50.54(f).

If you require any additional information please contact me.

Very truly yours,


James J. Fisicaro
Manager, Licensing

JJF/prm
Attachment

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cc: Mr. Robert Martin
U. S. Nuclear Regulatory Commission
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611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Senior Resident Inspector
Arkansas Nuclear One - ANO-1 & 2
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U. S. Nuclear Regulatory Commission
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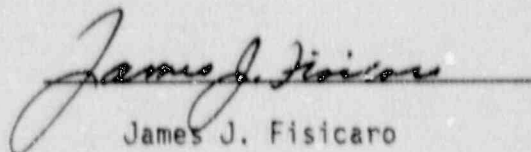
Ms. Sheri Peterson
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11555 Rockville Pike
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STATE OF ARKANSAS)
)
COUNTY OF POPE)

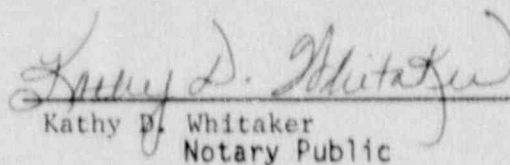
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AFFIRMATION

I, James J. Fisicaro, being duly sworn, subscribe to and say that I am Manager, Licensing at ANO for Entergy Operations, Inc.; that I have full authority to execute this affirmation; that I have read the ANO response to Generic Letter 90-03 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.


James J. Fisicaro

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 16th day of November, 1990.


Kathy D. Whitaker
Notary Public

My Commission Expires:

July 15, 1995

ANO RESPONSE TO GENERIC LETTER 90-03

I. BACKGROUND

A. ANO Vendor Interface Program for Compliance to Generic Letter 83-28, Item 2.2.2

In response to Generic Letter (G.L.) 83-28, item 2.2.2; "Vendor Interface", Entergy Operations at ANO established a vendor interface program to satisfactorily comply with this requirement.

As discussed in NRC Letter dated December 13, 1988 (OCNA128813), the NRC Staff approved the ANO program for vendor contact and manual maintenance based on the following actions:

- Formally proceduralize interface with approximately 20 principal safety related vendors.
- Establish initial telephone contact by a single licensee point of contact.
- Establish an annual contact with these vendors and document telephone conversation record.
- Establish a contact program for approximately 350 lesser safety related vendors for verifying that the latest technical and maintenance information is sent to ANO.
- Procedurally control interface with vendors through the newly developed Engineering Services group.

Based on satisfactorily completing these actions, the NRC concluded that Entergy Operations at ANO would comply with the requirements of G.L. 83-28 item 2.2.2. The NRC also concluded that Entergy Operations at ANO would be held to this commitment for the vendor interface program in lieu of alternate actions which may be required by a future generic letter on vendor interface programs.

B. Actions Required by Generic Letter 90-03

As discussed in G.L. 90-03 the NRC states that an adequate vendor interface program should include:

"(a) A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. This program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSS vendor;

and

(b) A program of periodic contact with the vendors of other key safety-related components not included in (a) above."

"The vendor interface program should also take into account the requirements of 10 CFR Part 50, Appendix B which requires the licensee or applicant to be responsible for establishing and executing the quality assurance program. It states that the licensee or applicant may delegate to others the work of establishing and executing the quality assurance program or any part of it, but the licensee or applicant shall retain responsibility for the program. Therefore, the licensee or applicant should have a program which assures that procedures and instructions are properly prepared and implemented and that quality assurance programs for design, maintenance or modification work performed on safety-related equipment by outside vendors or contractors are properly implemented. These programs should clearly establish and delineate in writing the authority and duties of persons and organizations performing activities affecting this safety-related equipment."

"In the event that vendors have gone out of business, cannot be identified, or will not supply information, the licensee or applicant should implement or continue to maintain a program that will assure that sufficient attention is paid to equipment maintenance, replacement, and repair to compensate for the lack of vendor backup such that equipment reliability commensurate with its safety function is assured."

Therefore, in response to Generic Letter 90-03 the discussion in Section II is being provided to document compliance for our vendor interface program based on the committed actions in A above. The information provided in Section III addresses additional considerations provided by Generic Letter 90-03.

II. COMPLIANCE WITH NRC LETTER OF DECEMBER 13, 1988

A. Control of Vendor Manuals

The overall control of the vendor manual program is under the responsibility of the Superintendent, Configuration Management who reports to the Manager, Engineering Support. The ANO vendor manual program is controlled under Engineering Procedure 1092.182, Vendor Technical Manual Review and Update. This procedure provides for the acquisition, update and distribution of vendor technical manuals and for the vendor interface program.

B. Vendor Contact Lists

A file of all communications with safety related and non-safety related vendors is maintained. This file is used to help validate the accuracy and completeness of ANO vendor manuals.

Engineering Procedure 1092.182 requires that a file of "Key" safety related vendors is maintained. This list includes, as a minimum, contact with the NSSS vendors, diesel generator suppliers and major safety-related switchgear vendors. The list also contains vendors of key components as suggested by GL 90-03. This list is maintained active and may vary based on determination of what components represent the "Key" safety related vendors. The list currently contains 35 specified vendors.

C. Vendor Interface

The responsibility for initial vendor contact is given to the Manager, Industry Events Analysis and is controlled by Plant Assessment Procedure 1010.008, "Industry Events Analysis Program". The ANO safety related and non safety related vendors are contacted in writing every 18 months to obtain manual updates. Vendors are directed to provide manual revisions to both ANO Industry Events Analysis for evaluation and to Engineering Support for manual revision.

Then at least once per year Engineering Support verbally contacts the vendors on the list of "Key" safety related vendors. Vendor information and manual updates for this specific group of vendors is ensured by obtaining either vendor information or verification that no new information is available. This may require either written or verbal follow-up. Other vendors are contacted as necessary to assure receipt of manual revisions.

A file of all vendor contacts (either through written correspondence or by telephone conversation record) is maintained and is linked to the technical manual for traceability. These files are controlled under Engineering Procedure 1092.182.

D. Related ANO Vendor Manual Controls

The Technical Manual System (TMS) within the Station Information Management System (SIMS) is the primary system for maintaining revisions, distribution and applicability status of vendor technical manuals. Specifically the ANO "Component Data Base" is used to determine the latest vendor manuals on a component basis is current. These systems are procedurally controlled in order to ensure accuracy and current status.

SIMS is the system used to access the correct vendor manual within ANO for procurement, maintenance, operations, and design engineering.

III. ANO PROGRAMS TO FURTHER ADDRESS GENERIC LETTER 90-03

A. Elements of Vendor Interface Program

The two basic elements of the vendor interface program as required by G.L. 90-03 (elements "a" and "b") are embodied in the ANO G.L. 83-28 item 2.2.2 program discussed in Section II above. The current vendor interface program is considered by Entergy Operations at ANO to be in compliance with these NRC required program elements. As discussed in NRC letter of December 13, 1988, this ANO approach was concluded to be acceptable for meeting G.L. 83-28 item 2.2.2.

B. ANO QA Program on Vendor Interface

The ANO QA Program implements the requirements of 10CFR50 Appendix B (Sections 4.0 and 7.0) and delineates the division of responsibilities between ANO and vendors. This is done as follows:

The Program and implementing procedures provide assurance that work performed by vendors is adequately controlled.

1) ANO Procurement Procedures for materials and equipment:

- 1000.10 "Control of Procurement"
- 1033.01 "Receipt Inspection"
- 1033.05 "Material Technical Control"
- 1033.011 "Material Technical Evaluation"
- 6000.00 "Control of Procurement Processes"
- 6050.02 "Dedication of Commercial Grade Item"
- 6020.04 "Preparation, Review, Approval and Control of Specifications"
- QAO-3 "Vendor Qualification Program"
- ESP 213 "Nuclear Procurement"

2) ANO Procedures for Vendor Services:

- 1009.03 "Contract Administration Procedures"
- 1000.12 "Control of Site Contractors"
- QAO-3 "Vendor Qualification Program"

3) Vendor Qualification

- The Qualified vendor List (QVL) denotes suppliers whose QA/QC programs have been reviewed and accepted by ANO Quality Assurance.
- Potential suppliers are evaluated by ANO Quality Assurance prior to placement on the QVL by review of the supplier's QA program, plans and procedures.
- Each vendor is evaluated on an annual basis to assure continuing qualification for retention on the QVL.
- Verification of implementation of the Supplier's QA Program is also performed.

C. ANO Compensating Actions for Lack of Ongoing Vendor Programs

In order for a safety related component vendor to remain on the ANO QVL, they are obligated to assure that their QA program meets 10CFR50 Appendix B including any supporting documentation for component qualification for safety related applications. In the event that a vendor has gone out of business or has dropped their 10CFR50, Appendix B program, ANO must still assure that safety related replacement components or equipment meet Appendix B for their safety application.

If no safety related component replacements are available from a qualified vendor for a given application, then alternate component replacements may be obtained through commercial grade dedication or through a design change to the facility. These alternate safety related components are evaluated for suitability on their specific application to ensure they meet the fit, form and function requirements of the original component.