Entergy
Operations

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December 5, 1990

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U. S. Nuclear Regulatory Commission
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Mail Station P1-137
Washington, D. C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313/50-368
License Nos. DPR-51 and NPF-6
Proposed Change to Quality Assurance Manual Operations

Gentlemen:

As part of Entergy Operations continued effort to improve the Condition Reporting and Corrective Action program at Arkansas Nuclear One, several changes to procedure 1000.104, "Condition Reporting and Corrective Action", have been identified. One of the needed enhancements for the next revision is the deletion of the requirement to perform "corrective action to preclude recurrence" for non-significant conditions. The significance of a condition is determined per procedure 1000.104. Additionally, the Quality Assurance Manual Operation discusses significant conditions. Performing formal corrective action to preclude recurrence on non-significant conditions has been determined to necessitate an inappropriate amount of attention and diverts limited resources away from significant conditions. It is noteworthy that neither 10CFR50 Appendix B, Criteria XVI, "Corrective Action" nor ANSI N18.7-1976 Section 5.2.11, "Corrective Actions" requires action to preclude recurrence for non-significant conditions.

As discussed in a conference call on December 3, 1990, with Messrs Tom Westerman, Ian Barnes and Bill McNeill of NRC Region IV, a change to Section 16.2.2 of the ANO Quality Assurance Manual Operations (QAMO) will be required in order to implement this change. The change to the manual would limit the requirement to initiate corrective action to preclude recurrence to significant conditions adverse to safety. A proposed revised page is attached. A review of the QAMO change in accordance with 10CFR50.54(a) has concluded that this change would represent a reduction in the commitment in the program description previously accepted by the NRC and therefore, must be submitted to the NRC for approval prior to implementation.

The Inhouse Event Analysis section and the Condition Review Group will continue to review all Condition Reports and will judge the significance of the condition based upon the components safety function and other factors including repetitiveness of the condition as stated in procedure 1000.104. Should a non-significant condition have a greater than acceptable recurrence rate it would be classified as significant and actions initiated through the Condition Reporting program to prevent recurrence.

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As discussed during the conference call on December 3, 1990, we plan to revise procedure 1000.10 by January 1, 1991. Should you have any questions, please contact me at 501 964-8601.

Very truly yours,

James J. Fisicaro
Manager, Licensing

JJF/DEJ/sgw
Attachment

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16.0 CORRECTIVE ACTION

16.1 SCOPE

A corrective action system is established to assure that conditions adverse to plant safety, such as failures, malfunctions, deficiencies, deviations, defective materials and equipment, abnormal occurrences and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to safety, this is to assure that the cause of the condition is determined and corrective action taken is documented and reported to appropriate levels of management for independent review.

16.2 GENERAL

16.2.1

When deviations, deficiencies, malfunctions, nonconformances or other abnormal occurrences or conditions are encountered, they are to be reported to responsible authorities for review and disposition in accordance with approved procedures.

16.2.2

Cognizant supervisors are to review discrepancies discovered during the course of plant operations and take appropriate action to resolve the discrepancies. For significant conditions adverse to safety, they are to initiate action to identify their root causes and take necessary corrective action to preclude repetition.