



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

FEB 28 1995

Entergy Operations, Inc.
ATTN: J. W. Yelverton, Vice President
Operations, Arkansas Nuclear One
1448 S.R. 333
Russellville, Arkansas 72801-0967

SUBJECT: REVIEW OF CHANGES TO QUALITY ASSURANCE MANUAL OPERATIONS,
REVISION 17 RELATED TO CLARIFICATIONS OF THE QA PROGRAM
DESCRIPTION

We have reviewed your 10 CFR 50.54(a) submittal dated July 18, 1994, which incorporates changes in your quality assurance program description, Arkansas Nuclear One Quality Assurance Manual Operation, Revision 17. The proposed changes primarily address your revised organization and adds clarifications in the quality assurance program description. In your submittal, you concluded that Arkansas Nuclear One Quality Assurance Manual Operation, Revision 17, did not reduce your commitments.

Our review of the proposed Arkansas Nuclear One Quality Assurance Manual Operation, Revision 17, determined that the definition of "modification" was changed. The revised definition of modification is not consistent with, and is more limiting than, the definition contained in ANSI N45.2.10-1973, Quality Assurance Terms and Definitions, and Arkansas Nuclear One Quality Assurance Manual Operation, Revision 16. Our evaluation of the change, included as an attachment to this letter, indicates that the change is a reduction of a commitment which requires NRC approval. The proposed revision to your quality assurance manual appears to limit your design control process to changes in the design bases. The proposed revision does not include a description of how design changes which are not a change to the design bases are controlled. In accordance with 10 CFR 50, Appendix B, Criterion III and ANSI N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants, all design changes to items important to safety should be subject to design control measures commensurate with those applied to the original design. On February 17, 1995, Mr. Robert Pate of my staff discussed this concern with Mr. Steve Bennett and others of the Arkansas Nuclear One staff. We were unable to resolve the concern during that discussion.

Our review did not identify any additional reductions in commitments. Therefore, the proposed changes to your quality assurance program description included in Arkansas Nuclear One Quality Assurance Manual Operation, Revision 17, with the exception of the change to the definition of "modification," are accepted. Should you wish to change the definition of "modification," as contained in the proposed Arkansas Nuclear One Quality Assurance Manual Operation, Revision 17, please submit the change separately. Please include the necessary description of the design controls you intend to implement to assure that 10 CFR 50, Appendix B, Criterion III and ANSI N45.2.11-1974 requirements are met.

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Entergy Operations, Inc.

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Please contact Mr. W. P. Ang of my staff at (510)975-0310 with any questions you have regarding this matter.

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Safety

Dockets: 50-313
50-368
Licenses: DPR-51
NPF-6

Attachment: As stated

cc w/attachment:
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*previously concurred

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ATTACHMENT

Evaluation of Revised Definition of "Modification"

1. Arkansas Nuclear One Quality Assurance Manual Operation (ANOQAMO), Revision 16 and ANSI N45.2.10-1973, Quality Assurance Terms and Definitions, define "modification" as "A planned change in plant design or operation and accomplished in accordance with the requirements and limitations of applicable codes, standards, specifications, licenses and predetermined safety restrictions."
2. ANOQAMO, Revision 17 changes the definition of "modification" to "A physical change in plant structure, system or component which alters the design bases of the item or its applicable interfaces or requires changes to those technical requirements which govern performance of the item's design bases." The ANOQAMO, Revision 17, revision record states that the definition was changed "to support an enhanced design change process."
3. The definition of "modification" in ANOQAMO, Revision 17, appears to be more narrow in scope than the definition contained in Revision 16. Revision 17 does not provide sufficient detail to ensure that the scope has not changed. Section 3.5, Design Change, of ANOQAMO, Revision 17, provides the process and controls for design changes but does not specify how the controls are to be applied to the revised definition of "modification." ANOQAMO, Revision 17, does not specify the process and controls for determining that a change to a structure, system, or component would continue to ensure that the design bases has been maintained. Your design change process should be consistent with the requirements of ANSI N18.7-1976 (endorsed by Regulatory Guide 1.33) Sections 5.2.7 and 5.2.7.2 which states that modifications to safety related structures, systems and components shall be accomplished in accordance with ANSI N45.2.11.

Entergy Operations, Inc.

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E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE01)

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MIS System
RIV File
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Jerry W. Yelverton
Vice President
Operations ANO
10CFR50.54(a)(3)
10CFR50.71(e)

July 18, 1994

OCAN079404

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

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Revision 17 to the Quality Assurance Manual Operations

Gentlemen:

In accordance with 10CFR50.54(a)(3) and 10CFR50.71(e), enclosed are three controlled copies (Copy Nos. 1-3) of Revision 17 to the Arkansas Nuclear One (ANO) Quality Assurance Manual Operations (QAMO). Controlled copies (Copy Nos. 8 and 9) are also being forwarded to Region IV.

The changes made in Revision 17 to the QAMO have been evaluated as required by 10CFR50.54(a) to determine if quality commitments have been reduced. Results of these evaluations have determined that these changes do not reduce any commitments in the quality program description previously accepted by the NRC. The record of revision section of the QAMO identifies changes implemented by Revision 17.

Pursuant to 10CFR50.71(e)(4), future QAMO updates will be submitted 6 months subsequent to the ANO-1 refueling outages. As required by 10CFR50.71(e)(2), I hereby certify that to the best of my knowledge and belief, the information contained in Revision 17 to the QAMO accurately represents changes made since the previous submittal. These changes reflect information and analysis submitted to the Commission or prepared pursuant to Commission requirements or changes made under the provision of 10CFR50.54(a)(3).

94-1483

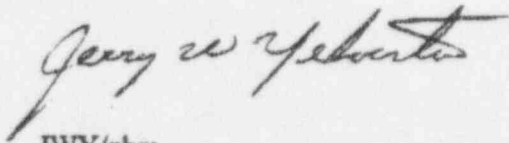
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U. S. NRC

July 18, 1994

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Very truly yours,



JWY/nbm

Enclosures

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