



**ENTERGY**

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November 6, 1995

**C. R. Hutchinson**

Vice President  
Operations  
Grand Gulf Nuclear Station

U.S. Nuclear Regulatory Commission  
Mail Station P1-37  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29  
Operational Quality Assurance Manual Change

GNRO-95/00119

Gentlemen:

For the past several years Grand Gulf has conducted performance-based audits to supplement the traditional compliance-based audits. This approach has contributed to strong performance in many areas of plant operation.

To continue to enhance strong performance, we feel it necessary to apply a performance-based approach to our scheduling process. Consequently, we have implemented changes to our Operational Quality Assurance Manual (OQAM) and Technical Requirements Manual (TRM) to eliminate required audit frequencies and audit topics and replace them with a performance-based audit scheduling program.

We have evaluated these changes in accordance with 10CFR50.54 and have determined that these changes enhance quality assurance commitments and increase the effectiveness of the audit program while maintaining compliance with 10CFR50 Appendix B requirements.

Problematic areas will receive increased quality oversight such as auditing. Good performing areas will receive less scrutiny; should performance later decline it will become a candidate for audit. Audit subject areas previously not considered due to resource limitations will be included in the audit scheduling program. Overall, these changes will result in increased flexibility to focus limited audit resources on areas of plant operation important to safety and in need of attention.

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Normally we would docket this quality assurance program change later along with our periodic submittal of other QA program changes. In this case, however, we felt it appropriate to highlight the change separately and initiate dialogue with NRC staff. Therefore, please find attached, in accordance with 10CFR50.54, a change to the Grand Gulf Operational Quality Assurance Manual and Technical Requirements Manual. (The TRM is our repository of relocated Technical Specifications.) Upcoming revision 14 to the OQAM and revision 9 to the Updated Final Safety Analysis Report will incorporate the changes we have attached to this letter.

Although, we have implemented the changes in the OQAM and TRM, we do not expect to immediately implement the new audit scheduling process, but will phase it in over the next 6 to 12 months. We would encourage NRC feedback over this period. For this purpose we have requested a meeting with NRC staff, including NRR and Region IV personnel, on the afternoon of November 16, 1995. At the meeting, we intend to present:

- Our rationale for proceeding with performance-based audit scheduling,
- Grand Gulf program specifics,
- River Bend program specifics.

We look forward to meeting with you on November 16th.

Yours truly



CRH/MJL

attachment: Grand Gulf Operational Quality Assurance Program  
and Technical Requirements Manual Changes

cc: (See Next Page)

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cc: Ms. S. C. Black (NRC/NRR) (w/a)  
Mr. J. E. Tedrow (w/a)  
Mr. H. W. Keiser (w/o)  
Mr. R. B. McGehee (w/o)  
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18.4 (Continued):

18.4.3 Organizations supplying material, equipment or services are responsible for auditing their internal operations and their contractors and suppliers, as stipulated in the appropriate procurement documents, in order to verify compliance with the quality assurance program requirements specified in the procurement documents.

18.4.4 The section deleted in Revision 5.

18.5 REQUIREMENTS

18.5.1 A comprehensive program of planned and documented audits shall be established and implemented by Quality Programs, and the off-site Quality Organization to verify compliance with all aspects of the Operational Quality Assurance Program. The audit program shall be carried out in accordance with written approved procedures which address the requirements of this Policy.

18.5.2 The audit program shall provide for both internal and external audits. Internal audits shall include audits of the procedures and performance of all licensee organizations whose activities affect the quality of safety-related structures, systems and components. External audits shall include audits of the practices, procedures and instructions of contractors and suppliers who provide safety-related material, equipment or services.

18.5.3 Audits shall provide an objective evaluation of quality related practices, procedures, instructions, activities, and items; and review of documents and records.

18.5.4 ~~Audits of operating plant activities shall include, as a minimum, those specified in the CCNS Technical Specifications. This section is deleted.~~

18.5.5 Audits shall be performed by trained, qualified personnel not having direct responsibilities in the areas being audited. Qualification and training requirements for auditors shall be established and documented and records of auditor qualifications shall be maintained and kept current. Personnel selected for quality assurance audit assignments shall have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited.

18.5.6 An audit schedule shall be developed, maintained, reviewed and updated, as necessary. ~~The audit schedule shall address the following minimum requirements:~~ Audits shall be scheduled on the basis of the status and importance of the activities to be audited.

18.5.6 (Continued):

- ~~18.5.6.1 Auditing shall be initiated as early in the life of an activity as practical to assure timely implementation of quality assurance program requirements.~~
- ~~18.5.6.2 Audits shall be scheduled on the basis of the status and importance of the activities to be audited.~~
- ~~18.5.6.3 Those specified in the CGNS Technical Specifications.~~
- 18.5.7 Individual audits shall be performed in accordance with documented plans and checklists which describe the audit and provide for an objective evaluation of the status and adequacy of the areas being audited.
- The "objective evaluation" referenced is not to be confused with the evaluation statement in ANSI N45.2.12 to which the licensee has provided a clarification. See Appendix A.
- 18.5.8 Audit results, including conditions adverse to quality detected during the audit, shall be documented and reviewed with the supervisor or manager having responsibility in the areas audited. Distribution of audit reports shall include management of the audited organization and appropriate licensee management.
- 18.5.9 Management of the audited organizations shall be responsible for correcting conditions adverse to quality identified during an audit. They shall assure that corrective action is scheduled, accomplished as scheduled, and documented. The corrective action shall be designed to prevent the recurrence of significant conditions adverse to quality. (See also Appendix A, Regulatory Guide 1.144, Item 11.)
- 18.5.10 Deficient areas shall be reviewed or reaudited on a timely basis to verify implementation of corrective action.
- 18.5.11 Audit results shall be analyzed to detect adverse quality trends and to evaluate the effectiveness of the Operational Quality Assurance Program. Results of such analyses which indicate adverse quality trends shall be reported to appropriate management for review and assessment.
- 18.5.12 Records shall be generated and retained for all audits, including individual audit plans, audit reports, written replies, and records of corrective action. (See also Appendix A, Regulatory Guide 1.144, Item 13.)

18.5 (Continued):

- 18.5.13 The licensee interprets the requirements of ~~Technical Specification 6.5.2.8,~~ **the Updated Final Safety Analysis Report, Chapter 16, Appendix 16B, section 7.4.2.8,** which requires that audits shall be performed under the cognizance of the SRC, to be met by the following: The SRC shall review the results of audits of nuclear **related** activities conducted in accordance with the GGNS Operational Quality Assurance Program, **and maintain cognizance of the audit schedule."** ~~Audits shall be conducted and results shall be reviewed in the areas listed in Technical Specification 6.5.2.8.~~

NRC Regulatory Guide 1.30 - Section 6 (Continued):

calibration and identity of person that performed the calibration, can be readily determined. Such information may also be contained on tags or labels which may be attached to installed instrumentation."

Section 7 - Data Analysis and Evaluation will be implemented as stated herein after adding the clarifying phrase "where used" at the beginning of that paragraph.

Section 8 - Records will be implemented by conformance with Policy 17 of the Operational Quality Assurance Program and ANSI N45.2.9 as set forth in Appendix A to that Program.

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NRC Regulatory Guide 1.33 - "Quality Assurance Program Requirements (Operation)" (Rev. 2, 2/78) - Endorses ANSI N18.7 - 1976.

The Operational Quality Assurance Program complies with the requirements of this Guide with the following clarifications:

- 1) Paragraph C.3 of Regulatory Guide 1.33 (and Section 4.3.4 of ANSI N18.7 which it references) will be implemented as required by the applicable nuclear facility Technical Specifications which define "Subjects Requiring Independent Review."
- 2) Paragraph C.4 ("Audit Program") of Regulatory Guide 1.33 (and Section 4.5 of ANSI N18.7 - 1976 which it references).

Audit frequencies will be implemented as required by the applicable Code of Federal Regulations, Updated Final Safety Analysis Report, and commitments by various correspondence to the NRC. All other audit frequencies will be ~~implemented as required by applicable current Technical Specifications or on a schedule based on performance results and importance of the activity relative to safety. and risk significance.~~

- 3) Paragraph C.5.a of Regulatory Guide 1.33 (and Section 4.4 of ANSI N18.7 which it references) will be implemented with the clarification that the Plant Safety Review Committee shall perform this activity.
- 4) Paragraph C.5.d of Regulatory Guide 1.33 (and Section 5,2.7.1 of ANSI N18.7 which it references) will be implemented by adding the clarifying phrase "Where practical" in front of the fourth sentence of the fifth paragraph. The Regulatory Guides changing of the two uses of the word , 'should' in this sentence to "shall" unnecessarily restricts the licensee's options on repair or replacement parts. It is not always practical to test parts prior to use. For modifications where these requirements are not considered practical, a review in accordance with the provisions of 10CFR50.59 will be conducted and documented.

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- 7.4.2.5 The SRC shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.
- 7.4.2.6 The quorum of the SRC necessary for the performance of the SRC review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least 7 SRC voting members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.
- 7.4.2.7 The SRC shall review:
- a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
  - b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
  - c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
  - d. Proposed changes to Appendix A Technical Specifications or this Operating License.
  - e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
  - f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
  - g. All REPORTABLE EVENTS.
  - h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
  - i. Reports and meetings minutes of the PSRC.
  - j. Written reports from audits of ~~the ALARA program~~ nuclear related activities.
- 7.4.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. ~~These audits shall encompass~~ This will be accomplished by the SRC conducting reviews of the results of audits of nuclear related activities conducted in accordance with the GGNS Operational Quality Assurance Program, and maintaining cognizance of the audit schedule.



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- a. ~~The conformance of unit operation to provisions contained within the Appendix A Technical Specifications and applicable license conditions at least once per 12 months.~~
- b. ~~The performance, training and qualifications of the entire unit staff at least once per 12 months.~~
- c. ~~The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.~~
- d. ~~The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.~~
- e. ~~The Emergency Plan and implementing procedures at least once per 12 months.~~
- f. ~~The Security Plan and implementing procedures at least once per 12 months.~~
- g. ~~Any other area of unit operation considered appropriate by the SRC or the Vice President, Operations-GGNS.~~
- h. ~~The Fire Protection Program and implementing procedures at least once per 24 months.~~
- i. ~~An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.~~
- j. ~~An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.~~
- k. ~~The radiological environmental monitoring program and the results thereof at least once per 12 months.~~
- l. ~~The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.~~
- m. ~~The Process Control Program and implementing procedures for solidification of radioactive wastes at least once per 24 months.~~
- n. ~~The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, February 1979, at least once per 12 months.~~