



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

NOV 28 1995

Entergy Operations, Inc.
ATTN: C. R. Hutchinson, Vice President
Operations - Grand Gulf
P.O. Box 756
Port Gibson, Mississippi 39150

SUBJECT: GRAND GULF GRADED QUALITY ASSURANCE MEETING

This refers to the meeting conducted in the Region IV office on November 16, 1995. At this meeting your staff described the actions and scope of activities undertaken to develop a process for applying Graded Quality Assurance requirements to plant systems, components, and equipment.

We concluded that your staff had expended a significant amount of resources to develop a well thought out process that should apply resources more appropriately to items that are of greater safety significance. We appreciate the time your staff took to discuss, globally, these upcoming changes to your programs and processes.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

J. E. Dyer, Director
Division of Reactor Projects

Docket: 50-416
License: NPF-29

Enclosures:
1. Attendance List
2. Licensee Presentation

cc w/enclosures:
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and Chief Operating Officer
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Division of Solid Waste Management
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Claiborne County Board of Supervisors
ATTN: President
Port Gibson, Mississippi 39150

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Bechtel Power Corporation
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Nuclear Station General Manager
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Jackson, Mississippi 39201

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State Health Officer
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Entergy Operations, Inc.
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P.O. Box 31995
Jackson, Mississippi 39286-1995

Entergy Operations, Inc.
ATTN: Michael J. Meisner, Director
Nuclear Safety
and Regulatory Affairs
P.O. Box 756
Port Gibson, Mississippi 39150

NOV 28 1995

Energy Operations, Inc.

-4-

bcc to DMB (IE45)

bcc distrib. by RIV:
L. J. Callan
Branch Chief (DRP/D)
MIS System
Project Engineer (DRP/D)
RIV PAO

Resident Inspector
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
RIV File
Branch Chief (DRP/TSS)
RSLO

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GAPick;cm		PHHarre		JEDyer				
11/28/95	26.4.1995	11/28/95		11/28/95				

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NOV 28 1995

Energy Operations, Inc.

-4-

bcc to DMB (IE45)

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L. J. Callan
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PE:DRP/D		C:DRP/D		D:DRP					
GAPick;cm		PHHarre		JEDyer					
11/28/95	26.12.195	11/28/95		11/28/95					

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MEETING: PERFORMANCE-BASED AUDITS BY GRAND GULFDATE: NOVEMBER 16, 1995

ATTENDANCE LIST

(PLEASE PRINT CLEARLY)

NAME	ORGANIZATION	POSITION TITLE
P. HARRELL	REGION IV / NRC	BRANCH CHIEF
W. P. ANG	REGION IV NRC	GROUP LEADER
J.J. Petrosino	NRC/NRR/DRCH	QA Specialist
SUZANNE BLACK	NRC/NRR/DRCH/HOMB	BRANCH CHIEF
Paul O'Connor	NRC/NRR/DRPW/PA41	PROJECT MANAGER
BRUCE BOGER	NRC/NRR/DRCH	DIVISION DIRECTOR
T. P. Gwynn	NRC RTV	DIRECTOR, DMS
George A. Zinke	ENERGY RIVER BEND	MANAGER QA
Mike Lanson	ENERGY / GRAND GULF	SR LICENSING SPEC.
Curtly Hyatt	EOI Grand Gulf	Director, Quality
JIM REAVES	EOI GRAND GULF	TECHNICAL COORD. - Quality
SCOTTY C. ROBERTS	EOI - Bethesda (Headquarters)	Director Nuclear Safety & Licensing
MIKE MORGAN	EOI - Grand Gulf	Director Nuclear Safety & Regulatory Affairs
DAN PACE	EOI - Grand Gulf	Gen Manager - CONS
Bob Gramm	NRC/NRR/DRCH	QA Section Chief
JIM LYNCH	SEA INC. ^{CONTRACT SUPPORT} NRR QA	VICE PRESIDENT
DOUGLAS L. DAVIS	TH ELECTRIC	MANAGER NUCLEAR OVERVIEW
DAVE MCAFFEE	TH ELECTRIC (CONTRACT SUPPORT)	MANAGER PROG OVERVIEW
Kenneth Hughey	EOI	Dir. Ops Support
Julius Fowler	EOI - River Bend	QA Supv.
Rick J. King	EOI - Arkansas Nuclear One	Supv. Licensing
A. CARTER ROBERTS	ARIZONA PUBLIC SERVICE - PAO UROCK	TECH ASSI. NUC REG AFFAIRS
Stephen D. Floyd	Nuclear Energy Institute	Dir., Licensing + Perf-Based Regs.
ADRIAN HEYMER	NUCLEAR ENERGY INSTITUTE	PROJECT MGR

RIVER BEND STATION

PERFORMANCE BASED AUDIT PROCESS

George A. Zinke
Manager Quality Assurance
River Bend Station

ENCLOSURE 2

GOAL and OBJECTIVE

- Provide assurance of high quality future performance of plant, people, and processes
- Identify problem areas prior to unacceptable or safety significant consequences
- Allocate resources to most important areas
- Increase value gained from audits / assessments / surveillance's

IMPROVEMENT FOCUS

- Performance / Risk Based Scheduling
- Performance / Risk Based Attribute Selection

IMPROVEMENT FOCUS

- Expert Panel Process
 - Annual Audit / Assessment Scheduling
 - Quarterly Surveillance Scheduling
 - Attribute Selection
 - Real Time Check & Adjust
 - Use of Risk / Performance Criteria

IMPROVEMENT FOCUS

- Evaluation Tool Selection
 - Audit (Compliance / ANSI N45.2)
 - INPO Style Assessment and Assist
 - Surveillance
 - Monitoring

IMPROVEMENT FOCUS

- Evaluator Expertise / Abilities
 - Technical
 - Management
 - Human Performance

- Nuclear Review Board
 - Oversight of schedule
 - Oversight of scope

RISK / PERFORMANCE CRITERIA

- Importance
 - Proximity to nuclear safety (PSA)
 - Potential effects on nuclear safety
 - Potential implied effects on nuclear safety
 - Barrier importance
 - Business importance

RISK / PERFORMANCE CRITERIA

- Change
 - Significant change to process structure
 - Significant change to interfacing processes
 - Significant change to organizational responsibilities
 - Change to base requirements
 - New relevant operating experience

RISK / PERFORMANCE CRITERIA

- Self Assessment Potential
 - Performance Indicators
 - scope, results, use, predictive value
 - Self Critical Performance Evidence
 - Condition Report Threshold

RISK / PERFORMANCE CRITERIA

- Safety Culture
 - Human Performance History
 - Prevailing attitudes towards safety and quality of work
 - Disciplined approach to operations
 - Soundness of technical bases for actions

RISK / PERFORMANCE CRITERIA

- Internal Evaluation History
 - Evaluation Frequency
 - Audits, Surveillance's, Assessments, Monitoring
 - Open/Closed Issues
- Performance History
 - SALP/INPO Performance History
 - Performance Indicators
 - Plant Materiel Condition

RISK / PERFORMANCE CRITERIA

- Deficiency History
 - Condition Reports
 - Regulator Identified Weaknesses
 - Corrective Action History and Status
 - Events

EVALUATED PROGRAM GROUPINGS

- **CHEMISTRY/ENVIRONMENTAL/REMP**
- **COMPUTER SOFTWARE PROGRAM**
- **CORRECTIVE ACTION PROCESS**
- **DESIGN CONTROL / ENGINEERING PROCESSES**
- **EMERGENCY PREPAREDNESS**
- **FIRE PROTECTION**
- **FITNESS FOR DUTY / ACCESS
AUTHORIZATION**
- **ISI / NDE**

EVALUATED PROGRAM GROUPINGS


- **LICENSING ACTIVITIES / OPERATING
EXPERIENCE**
- **MAINTENANCE / M&TE**
- **OPERATION ACTIVITIES**
- **OFFSITE DOSE CALCULATION MANUAL**
- **OUTAGE MANAGEMENT**
- **PROCEDURE REVISION / DOCUMENT
CONTROL / RECORDS**
- **PROCUREMENT CONTROL/ MATERIAL
CONTROL**

EVALUATED PROGRAM GROUPINGS

- **QUALITY PROGRAM**
- **RADIOLOGICAL PROTECTION**
- **RADWASTE MONITORING / PROCESS
CONTROL**
- **SAFETY REVIEW PROGRAM**
- **SECURITY**
- **SPECIAL PROCESSES**
- **TECH. SPEC IMPLEMENTATION / IST**
- **TRAINING & QUALIFICATION**

IMPLEMENTATION STRATEGY

- RBS Phased Approach
 - Started in 1994
 - Major components of program in place by June 1996
 - No major changes expected in frequencies through the end of 1996

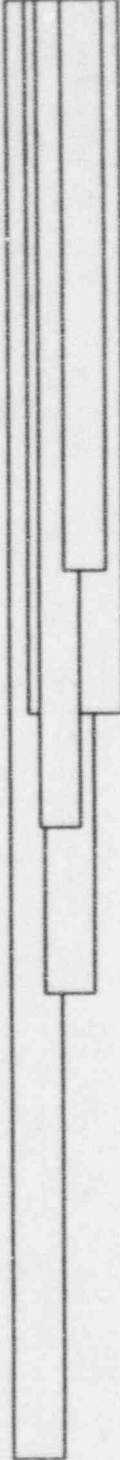


Performance-Based Audit Scheduling

Grand Gulf

Riverbend

*NRC Region IV
November 16, 1995*



Performance-Based Audit Scheduling

November 16, 1995

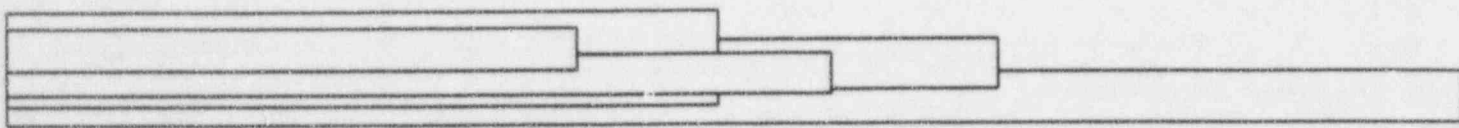
- ◆ **Introduction** **Mike Meisner**

- ◆ **Grand Gulf approach**
 - **QA program changes** **Mike Larson**

 - **Implementation plans** **Curtley Hayes**

- ◆ **River Bend approach** **George Zinke**

Introduction





Overview

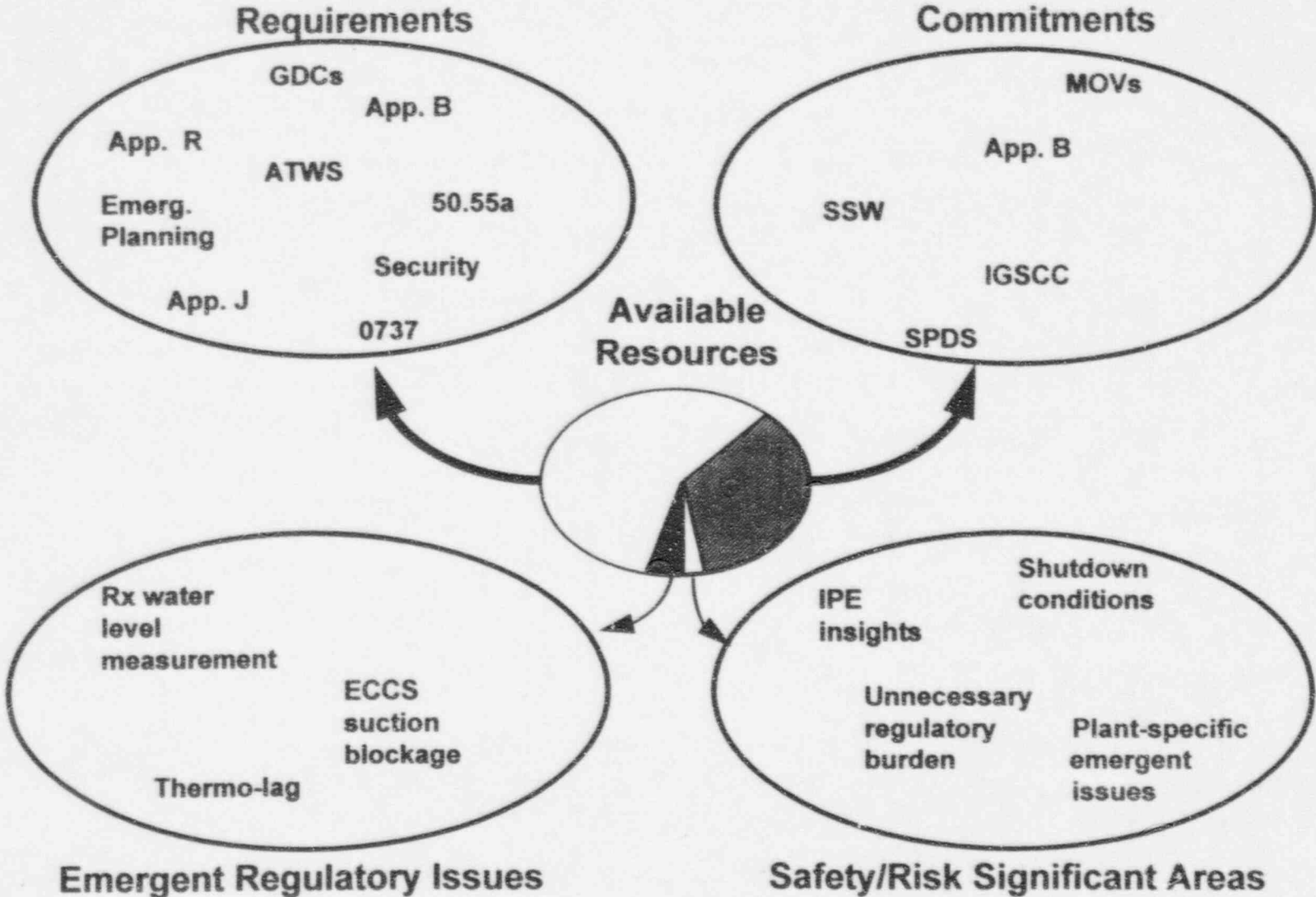
- ◆ **Grand Gulf and River Bend have implemented QA program changes to enable a performance-based approach to audit scheduling**
- ◆ **The changes will be phased in over an extended transition period**
- ◆ **In parallel, NEI has created the QA Forum Group to, in part, develop generic guidance for performance-based audit scheduling**




Why Change?

- ◆ Although audits themselves are becoming increasingly performance oriented (as opposed to compliance-based) little flexibility is available to determine what to audit
- ◆ On the order of 75% of audit resources are expended on required audits
- ◆ Required audits frequently add little value when focused on mature areas (e.g., license conditions)
- ◆ Many safety significant functions are not required to be audited (e.g., 50.59 process)
- ◆ Our understanding of what is important to safety changes over time - inflexible audit topics cannot accommodate this change

Resource Allocation in a Regulated Environment





Elements of Performance-Based Audit Scheduling

- ◆ Selection of audit subject areas
 - Important to safety
 - Plant-specific
- ◆ Assessment indicators reflecting performance with respect to:
 - Safety
 - QA program effectiveness
- ◆ Audit scheduling based on review of assessment indicators

*Performance-based audit scheduling is focused
on what to audit, not how to audit.*



Grand Gulf Approach

- QA program changes**



QA Program Changes

- ◆ **Improved Tech Specs (implemented in March, 1995) resulted in relocating audit requirements to:**
 - **FSAR, and**
 - **Technical Requirements Manual (TRM)**
- ◆ **QA program change was implemented on 11/6/95 to eliminate relocated audit topics and frequencies**
- ◆ **Changes do not affect audit requirements contained in 10CFR (e.g. Security)**
- ◆ **Although not required to be submitted at that time, changes were docketed on 11/6/95**



ENTERGY

Entergy Operations, Inc.
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November 6, 1995

C. R. Hutchinson
Vice President
Coordinating
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.

9511130215

November 6, 1995

GNRO-95/00119

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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)

November 6, 1995
GNRO-95/00119
Page 3 of 4

cc:

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Mr. J. E. Tedrow (w/a)
Mr. H. W. Keiser (w/o)
Mr. R. B. McGehee (w/o)
Mr. N. S. Reynolds (w/o)
Mr. H. L. Thomas (w/o)

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November 6, 1995
GNRO-95/00119
Page 4 of 4

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File (NS&RA) (w/a)
File (Central) (w/a) (12)

INPO Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

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 CGNS 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 These 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.

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.

GGNS
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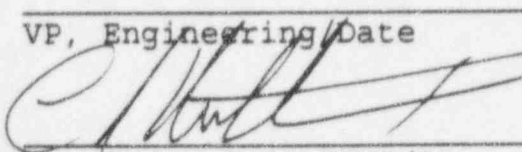

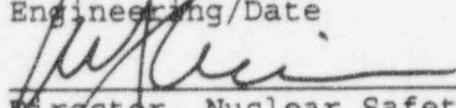
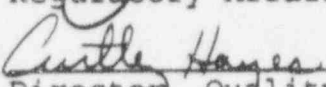
- 7.4.2.5 The SRC shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.
- 7.4.2.6 The quorum of the SRC necessary for the performance of the SRC review and audit functions of these Technical Specifications 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.


GGNS
UPRAR

- ~~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.~~

SECTION IV

Concurrence
Review Required
Y N

()	(X)	_____ VP, Engineering/Date	_____
(X)	()	 VP, Operations GGNS/Date	_____
(X)	()	 11/6/95 General Manager, Plant Operations/Date	_____
()	(X)	_____ Director, Design Engineering/Date	_____
(X)	()	 11/6/95 Director, Nuclear Safety & Regulatory Affairs/Date	_____
(X)	()	 11/6/95 Director, Quality	_____
()	()	_____	_____



Quality Assurance Program Changes

Section 18 and Appendix A of the Operational Quality Assurance (OQAM) had the following change:

- References to Technical Specifications related to audit subjects and schedules were removed**

Otherwise, requirements specifying when audits will be performed (i.e., “on the basis of the status and importance of the activities”) were retained

Quality Assurance Program Changes

Updated Final Safety Analysis Report Changes:

- **Audit subjects and frequencies were deleted. Subjects will be controlled in a QA administrative procedure.**
- **The following statement in section 7.4.2.8 now reflects how audits are treated:**

“Audits of unit activities shall be performed under the cognizance of the SRC. 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.”

**GRAND GULF
NUCLEAR STATION**

**PERFORMANCE
DATA
SYSTEM**

**Curtley C. Hayes
Director of Quality**

WHY PERFORMANCE DATA?

PREDICT:

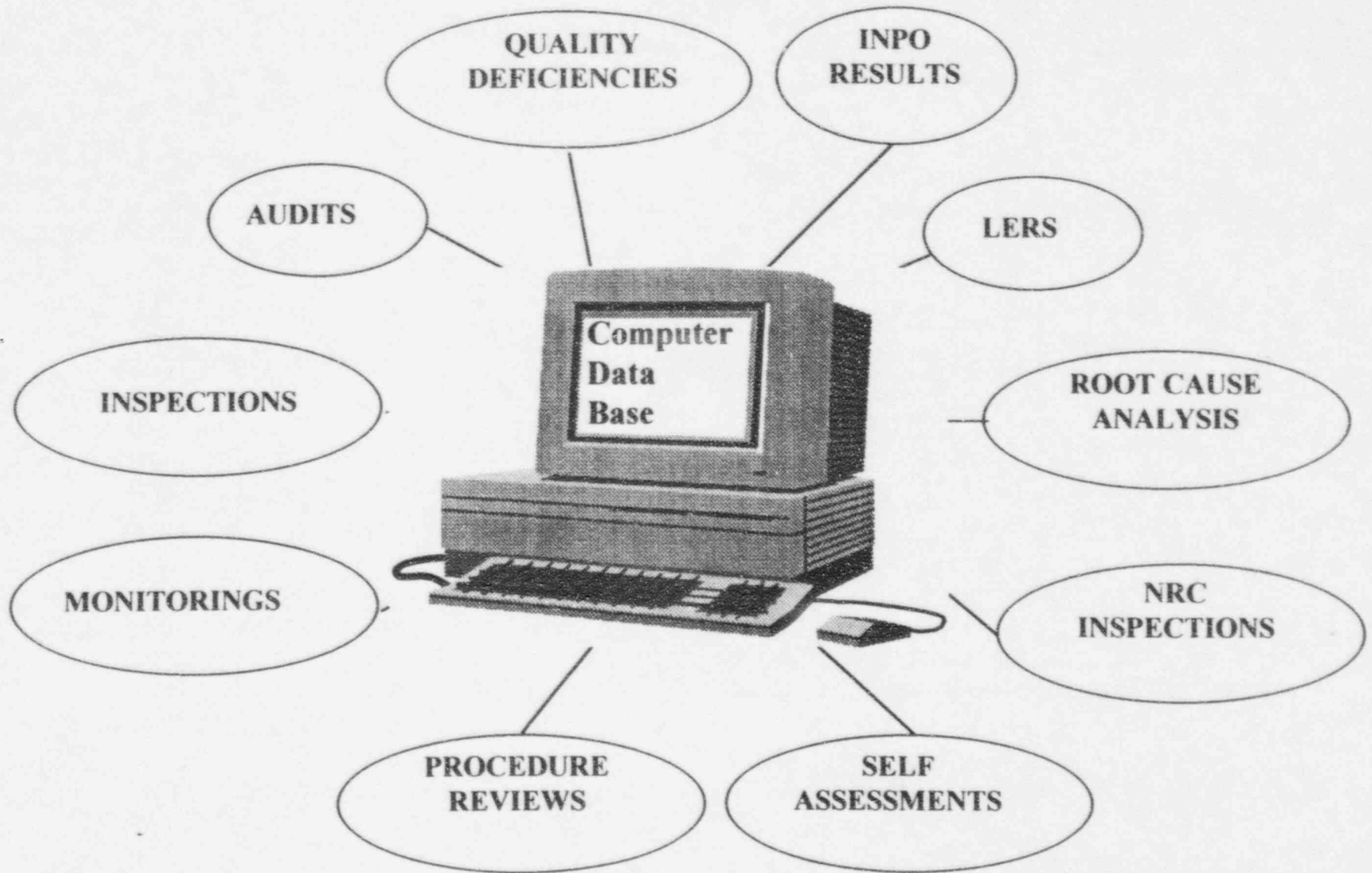
- **Activities to be Audited**
- **Items to Inspect**
- **Procedures to Review**
- **Areas to Monitor**
- **Declining Performance Trends**

PROGRAM CHANGES

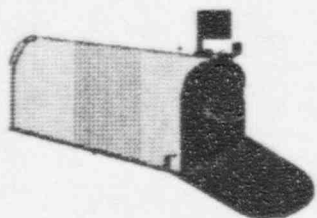
ELIMINATE/REDUCE:

- **Required Audit Frequencies**
- **Required Witness/Hold Points**
- **Established List of Procedures to be Reviewed by Quality**

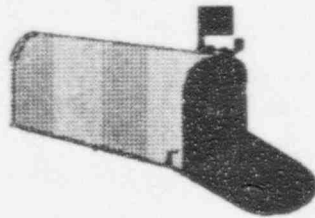
INFORMATION FACTORED INTO DATA BASE



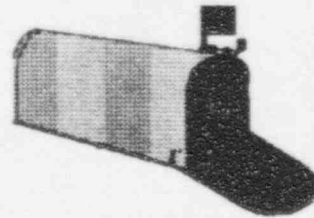
ACTIVITY CODE MAILBOXES (TOTAL 449)



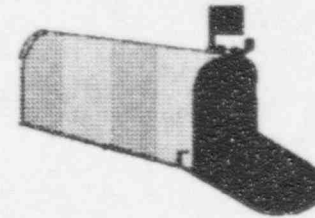
**CONFIGURATION
MANAGEMENT
(CODE 38)**



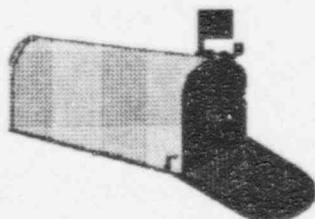
**TEMPORARY
ALTERATIONS
(CODE 146)**



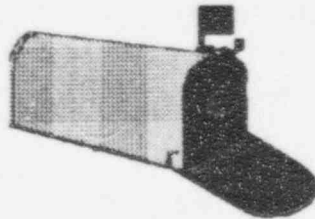
**TURNOVER
(CODE J59)**



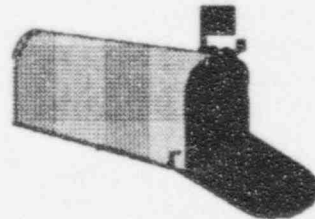
**TEAM WORK
(CODE J6)**



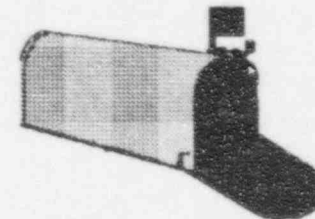
**ATTENTION TO
DETAIL (CODE 24)**



**MATERIAL
UTILIZATION
(CODE 72)**



**CLEARANCE/
PROTECTIVE
TAGGING
(CODE 143)**



**VALVE OPERATION
(CODE C17)**

ACTIVITY CODES

Attachment C

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Offsite Dose Calculation Manual	B2
Environmental Protection Plan	B3
Chemical Reagent Control	B4
Sampling Program	B5
Laboratory Activities Waste Control	B6
Chemical Control Program	B7
Hazardous Materials Program	B8
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Access Control/Security	J12
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Teamwork/Coordination Between Groups	J6
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Pre Job Briefing/Planning/HP	J81
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ACTIVITY CODES

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Soil Density Tests	10C8	Coatings and Preservatives	10R3
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ACTIVITY CODES

Attachment C

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red line changes initialed	56A7
procedure title on data sheet	56A8
procedure or attachment legible	56A10
revision bars	56A11
procedure format	56A12
periodic/two year review blank	56A13
tech spec triggers box	56A14
\$, # and/or !'s	56A15
10CFR50.59 Screening/Evaluations	U3
<u>Technical</u>	56B1
paragraph references	56B2
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data sheet steps and procedure steps agree	56B4
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TCN / ACN	56B6
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<u>Editorial</u>	56C1
procedure typed as submitted	56C2
procedure steps are clearly written (fog index)	56C3
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ACTIVITY CODES

Attachment C

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Protective Equipment	S4
Scaffolding/Ladders	S5
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Heat Stress	S7
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ACTIVITY CODES

Attachment C

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Security Equipment	E2
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Continuing Training	T10
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ACTIVITY RATING SCALE

- 1 Exceptional Performance/Strength**
- 2 Fully Acceptable**
- 3 Acceptable But Could Be Improved**
- 4 Minor Deficiency - Corrected During
Observation**
- 5 Non-Significant QDR/Non-Cited
Violation**
- 6 Significant QDR/Notice Of Violation**

ACTIVITY RATING SCALE

- 1 Exceptional Performance/Strength**
- 2 Fully Acceptable**
- 3 Acceptable But Could Be Improved**
- 4 Minor Deficiency - Corrected During Observation**
- 5 Non-Significant QDR/Non-Cited Violation**
- 6 Deficiency Associated with a Safety Significant System/Component**
- 7 Significant QDR/Notice of Violation**

GROUP CODES (TOTAL 126)

EXAMPLES:

MAINTENANCE

MECHANICAL

MME

ELECTRICAL

MEL

I&C

MIC

Etc.

OPS

LICENSED OPERATORS OL

RADWASTE

OR

FIRE PROTECTION

OF

Etc.

GROUP CODES

Attachment B

ADM SERVICES

Admin. Serv. Supt. ARS
Records Mgt. ARM
Doc Control ARD
Tech Pub. ART

CONTRACTORS/VENDORS

CV

DESIGN ENGINEERING

DE

Director Design Engineering DDE
(A) Electrical I&C
Procurement DEP
Electrical Systems DEE
Projects DES
I&C DEI
(B) Mechanical
Piping DMP
NSSS Systems DMS
Programs DMT
Safety Analysis DMA
(C) Civil
Configuration Mgmt DCC
Support DCS
STRL/Qual DCQ
STRL/Projects DCP
(D) Planning & Control DPC

EMERGENCY RESPONSE

ORGANIZATION

Technical Support Center TSC
Emergency Operations Facility EOF
Operations Support Center OSC
Field Monitoring Teams FMT
Emergency News Media Center ENM
Emergency Info Center EIC
State & Local EOC S/L

HUMAN RESOURCES

HR

MANAGEMENT

MGT

General Manager/Plant Staff

GM

MAINTENANCE

Manager Maint. MPM
Mechanical MME
Electrical MEL
I&C MIC
Plant Services MP
Planning/Sched Supt MPS
Mech Planning MMP
Elect Planning MEP
I&C Planning MIP
Maint. Scheduling MMS
M&TE Issue/Tool Room MTR

MATERIALS PURCHASING/CONTRACTS

Manager Matl. Purch. Contracts PMM
Contracts PC
Purchasing PP
Inventory Control PI
Stores PS
Materials Technical PT
Materials Project Coordinator PM

NUCLEAR SAFETY & REG AFFAIRS

Director NS&RA AD
Plant Licensing AL
Licensing Basis AB
Safety Issues AS
Operating Exper. AO
Safety Assessment AA

OPERATIONS

Manager Plant Operations OM
(A) Operations Supt.
Licensed Operators OS
Non-Licensed Operators OL
Trainees ON
Radiation OR
Shift Engineers OE
Fire Protection OF

(B) CHEMISTRY

Environmental CE
Plant Chemistry (Chem Supt) CC
Chemistry Tech Support CS

(C) RADIATION CONTROL

HP Dosimetry RD
Program RCP
HP Plant (HP Supt) RP
HP Radiowaste RR
HP ALARA RA
RP & Inst. RI

(D) OUTAGE SCHEDULING

OTS

(E) SAFETY ADMINISTRATION

SA

PLANT WALKTHROUGH

PW

PROJECTS & SUPPORT

Director Projects and Support PSD
Project Management PSM
Site Business Services PSS
Mod & Construction (PM&C) PMC
Emergency Preparedness PSE
IS & Telecommunication PST

QUALITY PROGRAMS

Director Quality/Quality QD
Audits QA
Reviews QR
NDE QN
Inspection QI
Trending QT
Program QP
Supplier Quality QS

INDUSTRY/OUTSIDE GROUPS

NRC Inspection Report INI
NRC Bulletin/Information Notice INB
NRC SALP INS
INPO INP
Nuclear Network INN
EPRI IEP
Publications IPB
Vendor identified IVD
Word of Mouth IMO

SECURITY

Medical SM
FFD SFD
Plant Security SF

SYSTEM ENGINEERING

Manager P&SE EMP
Systems ES
Root Cause ERC
Work Control EC
Reactor Engineering ERE
Engineering Support ESP
Maint Rulemaking Coordinator EMR
ISI EIS

TRAINING

Manager Training TMG
Manager Nuclear Training TMN
Simulator TS
Ops Requal TR
Ops Initial TI
Maintenance TM
Chemistry TC
HP TH
Accreditation TA
ESP TP

Corporate support

Information Services CIS
HP Instr. CHP
Human Resources CHR
Security CSE
Total Quality CTQ
Communications CCO
Nuclear Assurance CNO

Vice President/Site Staff

VPO

Vice President, Engineering

VPE

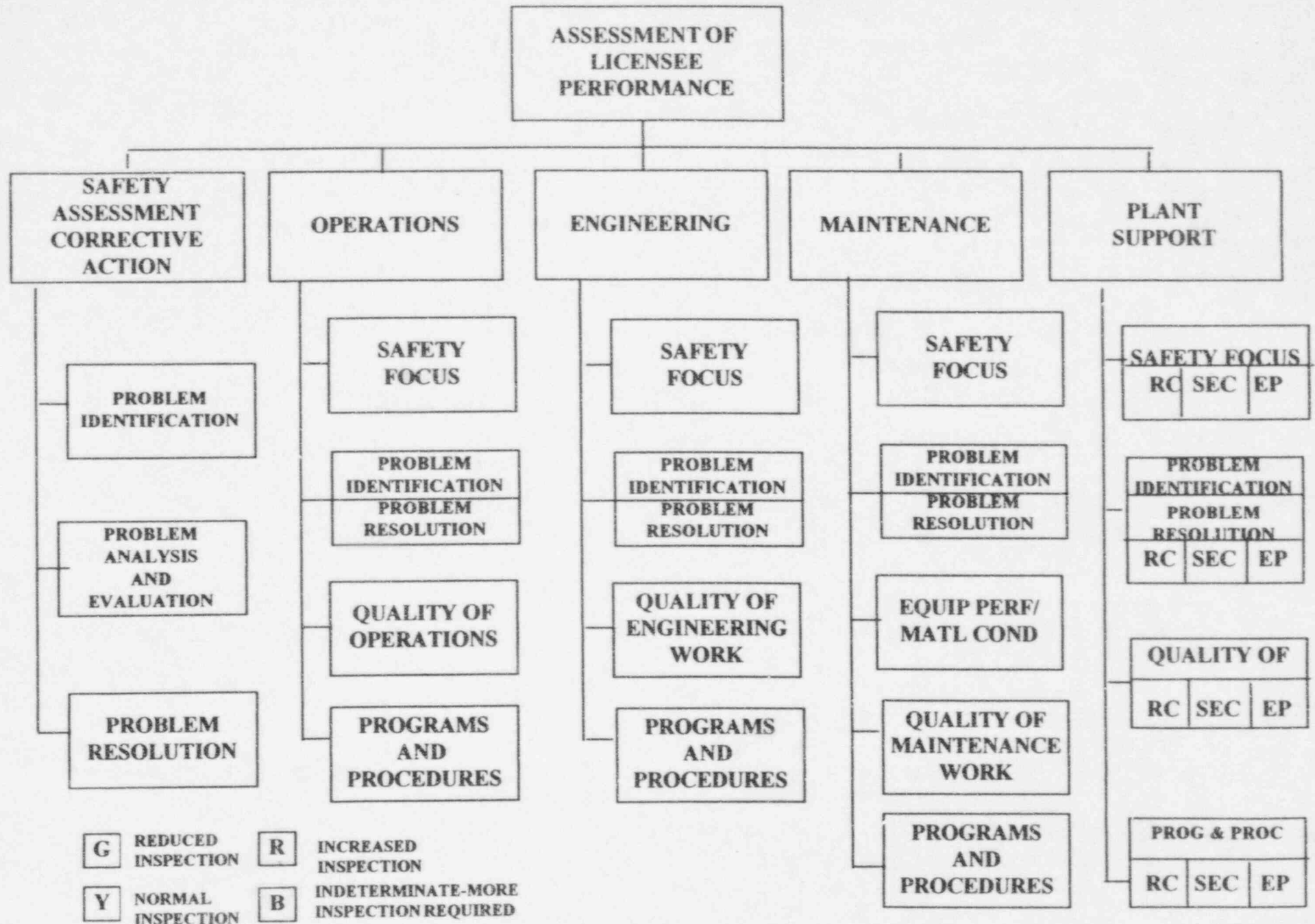
LOCATION CODES

<u>LOCATION</u>	<u>CODES</u>
Auxiliary Building	AB
Containment Building	CT
Control Building	CB
Control Room	CR
Diesel Building	DG
Drywell	DW
Energy Services Center	EC
Inside Protective Area	IA
Maintenance Shop	MS
Off Gas	OG
Outside Protective Area	OA
Radiowaste Building	RW
Standby Service Water	SSW
Steam Tunnel	ST
Turbine Building	TB
Warehouse	WH
Water Treatment Building	WB

TECHNICAL SPECIFICATION REQUIRED AUDITS

<u>SUBJECT</u>	<u>FREQ.</u>
• TECH SPEC/LICENSE CONDITIONS	12 MTHS
• PERFORMANCE/TRAINING/QUALIFICATIONS	12 MTHS
• EFFECTIVENESS OF CORRECTIVE ACTIONS	6 MTHS
• QA PROGRAM	24 MTHS
• EMERGENCY PLAN	12 MTHS
• SECURITY PLAN	12 MTHS
• SRC/MGT REQUESTED	
• BIENNIAL FIRE PROTECTION	24 MTHS
• ANNUAL FIRE PROTECTION	12 MTHS
• TRIENNIAL FIRE PROTECTION	36 MTHS
• RADIOLOGICAL ENVIRON MONITORING	12 MTHS
• OFFSITE DOSE CALCULATION MANUAL	24 MTHS
• PROCESS CONTROL PROGRAM	24 MTHS
• REG GUIDE 4.15	12 MTHS

PERFORMANCE ASSESSMENT/INSPECTION PLANNING TREE



INTEGRATED PERFORMANCE EVALUATION PROCESS

- **COLLECT DATA** (AUDITS, NRC INSPECTIONS, SELF ASSESSMENTS, MONITORING, DEFICIENCY DOCUMENTS, WITNESS/ HOLD POINT INSPECTIONS, ETC.)
- **ANALYZE DATA** (NEGATIVE, POSITIVE, SIGNIFICANT, INSIGNIFICANT, AMOUNT OF DATA, LACK OF DATA)
- **FINAL ANALYSIS** (RECOMMEND INCREASED, NORMAL OR DECREASED OVERSIGHT)
- **DOCUMENT RESULTS** (TRACK ON OPEN ITEMS LIST)

PROGRAMS/SUBJECTS TO BE EVALUATED

- **MEASURING AND TEST EQUIPMENT**
- **PLANT CONDITIONS**
- **OPERATION ACTIVITIES**
- **PLANT SAFETY**
- **PROCUREMENT CONTROL**
- **QUALITY ACTIVITIES**
- **RECORDS**
- **RADIOLOGICAL PROTECTION**
- **RADWASTE**
- **SECURITY**
- **SPECIAL PROCESSES**
- **STATUS INDICATION**
- **TECH. SPEC COMPLIANCE**
- **TEST CONTROL**
- **TRAINING**
- **SAFETY**

PROGRAMS/SUBJECTS TO BE EVALUATED

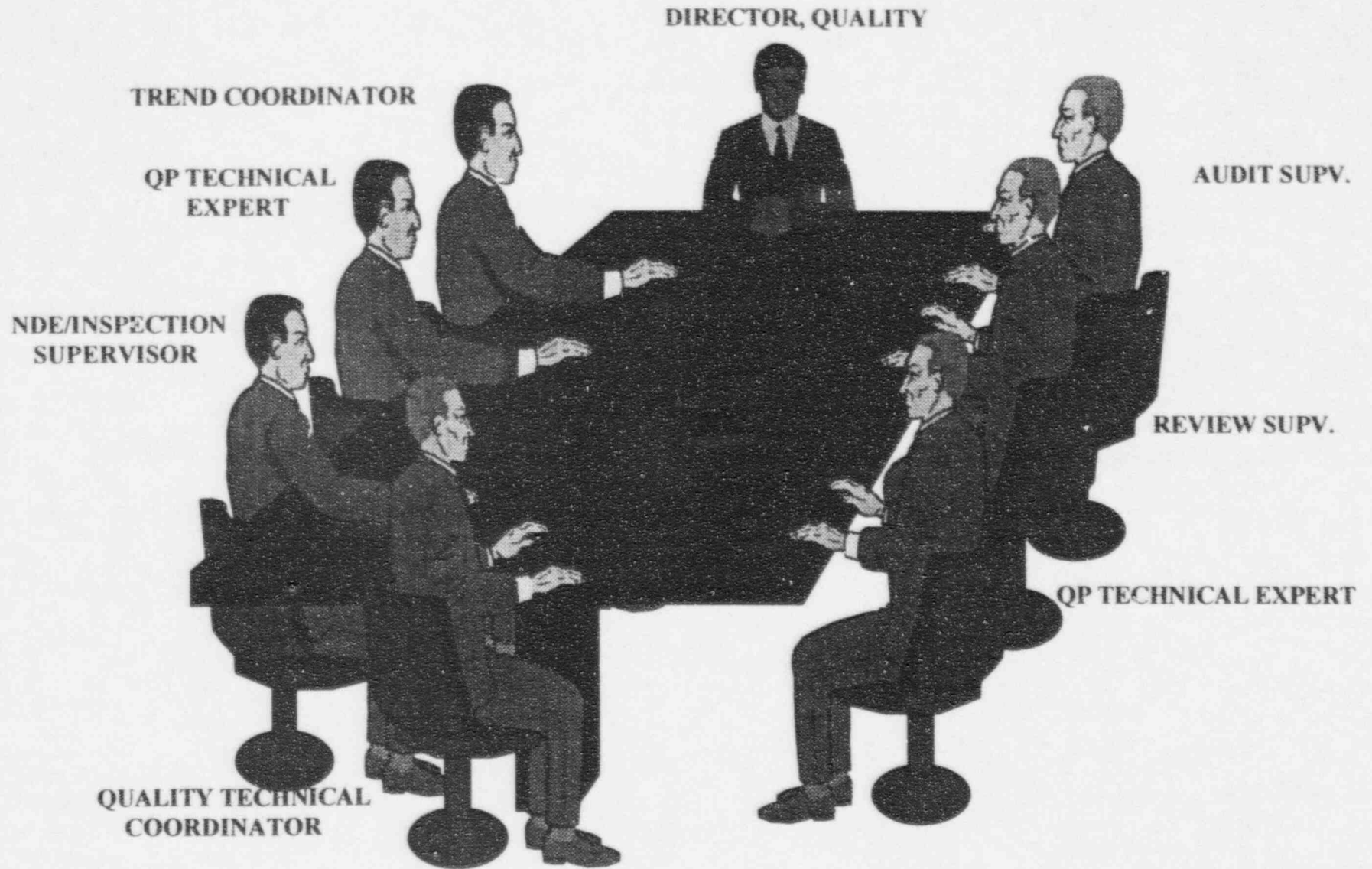
- **CHEMISTRY/ENVIRONMENTAL**
- **COMPUTER SOFTWARE**
- **CORRECTIVE ACTION PROCESS**
- **DESIGN CONTROL**
- **DOCUMENT CONTROL**
- **EMERGENCY PREPAREDNESS**
- **FIRE PROTECTION**
- **GENERAL ACTIVITIES**
- **HANDLING STORAGE AND SHIPPING**
- **IDENTIFICATION AND CONTROL**
- **INSPECTION**
- **INSTRUCTIONS PROCEDURES AND DRAWINGS**
- **LICENSING ACTIVITIES**
- **MAINTENANCE ACTIVITIES**
- **MATERIAL CONTROL**

<u>CHEMISTRY/ ENVIRONMENTAL</u>	<u>REDUCED</u>	<u>NORMAL</u>	<u>INCREASED</u>
<u>ELEMENTS</u>			
• B1 - Reg. Guide 4.15	X		
• B2 - Offsite Dose Calculation	X		
• B3 - Environmental Protection Plan			X
• B4 - Chemical Reagent Control		X	
• B5 - Sampling Program			X
• B6 - Laboratory Activities Waste Control			X
• B7 - Chemical Control Program			X
• B8 - Hazardous Materials Control			X
• B9 - Water Chemistry		X	

IPEP EXAMPLES

CHEMISTRY/ ENVIRONMENTAL	RECOMMENDATION	RATIONALE
Elements		
<ul style="list-style-type: none"> • B2 - Offsite Dose Calculation 	Reduce Oversight	38 data points analyzed: 35 fully acceptable, 2 non-significant deficiencies (QDR)
<ul style="list-style-type: none"> • B3 - Environmental Protection Plan 	Increase Oversight	41 data points analyzed: 35 fully acceptable, 2 recommended enhancements, 3 non-significant deficiencies (QDR) 1 significant deficiency (NCV)
<ul style="list-style-type: none"> • B4 - Chemical Reagent Control 	Normal Oversight	4 data points analyzed: 2 fully acceptable, 2 recommended enhancements

EXPERT PANEL



EVALUATION SCHEDULE

JAN	Training Computer Software Procurement Control	JULY	Operations Activities Licensing Activities
FEB	Design Control Corrective Action Process Test Control	AUG	Document Control Measuring & Test Control Status Indication
MARCH	Identification & Control Emergency Preparedness	SEPT	Radiological Protection Plant Conditions Radwaste
APRIL	Maintenance Activities Fire Protection	OCT	Chem/Environmental Inspection Attributes
MAY	Procurement Doc Control General Activities Security	NOV	Material Control Plant Safety Tech Spec Compliance
JUNE	Inst Proced & Dwgs Handling Storage & Shipping Special Process	DEC	Safety Quality Activities

10 CFR AUDITS

<u>AUDIT TOPIC</u>	<u>REQUIREMENT</u>	<u>FREQUENCY</u>
Emergency Preparedness	10CFR50.54(t)	Annual
Security (Safeguards)	10CFR50.54(p)(3)	Annual
Security Program	10CFR73.55(g)	Annual
Security Access Authorization	10CFR73.56(g)	Bi-ennial
Fitness for Duty	10CFR26.80	Annual
Radiation Protection	10CFR20	Annual
Special Nuclear Material	10CFR70.58(c)(2)	Annual

QUARTERLY OVERSIGHT SCHEDULE

FIRST QUARTER 1996

AUDITS:

- MAINTAINING PROCEDURES CURRENT
- EMERGENCY PLAN
- SECURITY AND SAFEGUARDS

ASSESSMENTS/MONITORING/INSPECTION:

- DOCUMENT CONTROL
 - PROCEDURE CONTROL
 - VENDOR MANUAL CONTROL
 - DOCUMENT UPDATES
 - ENGINEERING CALCULATION CONTROL
 - OPERATING LICENSE CONTROL
 - UFSAR/TRM CONTROL
 - 50.59 PROCESS ASSESSMENT
- REPORTABLE OCCURRENCES
- ENVIRONMENTAL PROTECTION PLAN

QUARTERLY OVERSIGHT SCHEDULE

SECOND QUARTER 1996

AUDITS:

- HP PROGRAM
(INCREASED OVERSIGHT OF:)
 - DOSIMETRY
 - EXPOSURE AND CONTAMINATION CONTROL
 - RADIATION PROTECTIVE CLOTHING
 - RADIOACTIVE MATERIAL CONTROL
- FITNESS FOR DUTY
- SPECIAL NUCLEAR MATERIAL

ASSESSMENTS/MONITORING/INSPECTION:

- CHEMICAL/ENVIRONMENTAL:
 - CHEMICAL SAMPLING PLAN
 - LAB. ACTIVITIES WASTE CONTROL
 - CHEMICAL CONTROL PROGRAM
 - HAZ. MATERIAL CONTROL
 - RADWASTE PROCESS CONTROL
 - RADWASTE ON SITE STORAGE