



April 14, 1992

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U. S. Nuclear Regulatory Commission
Document Control Desk
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Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & AFP-6
Change to the Arkansas Nuclear One,
Unit 1 and Unit 2 Quality Assurance Program;
Removal of Biennial Procedure Reviews

Gentlemen:

In accordance with 10CFR50.54(a), Entergy Operations is hereby requesting a change to the Arkansas Nuclear One, Unit 1 and Unit 2 (ANO-1&2) Quality Assurance Program as contained in the Quality Assurance Manual Operations.

The current ANO Quality Assurance Program commits to perform biennial reviews of ANO procedures as specified in ANSI N18.7-1976 (Section 5.2.15). However, programmatic controls currently exist at ANO which are equivalent to or are more effective in meeting the intent of ANSI N18.7-1976 than the static biennial review process.

The proposed change establishes an alternative method of maintaining procedures current in accordance with 10CFR50, Appendix B, in lieu of biennial reviews imposed by ANSI N18.7, Section 5.2.15. The alternative method implements a dynamic process for assessing procedural adequacy by initiating procedure reviews, changes or revisions, based on new or revised source material potentially affecting the content of procedures. The change is considered necessary to promote the quality of procedure review and revision controls through the effective use of resources.

Entergy Operations also proposes to supplement our existing ANO Quality Assurance Program for auditing procedures. The existing procedure audit process will be modified to include specific criteria for determining the adequacy of inclusion of source materials. Additional procedural review focus will be incorporated in the QA audit modules to include those criteria identified in the attached justification for ensuring effectiveness of the procedure revision process. Audits will be conducted on at least a biennial basis and more often, in accordance with ANO Technical Specifications, to assure program effectiveness.

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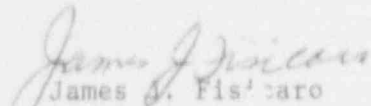
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Attachment 1 provides the basis and justification for the proposed change and Attachment 2 provides the proposed changes to the ANO Quality Assurance Manual Operations for NRC review.

Entergy Operations believes that the proposed process is equally or more effective to that provided by ANSI N18.7-1976. However, since this change constitutes a revision to ANO's commitments to ANSI N18.7, we request NRC review of the proposed change. In accordance with 10CFR50.54.a.3(iv), Entergy Operations will implement the proposed change upon approval by the NRC Staff or within 60 days from the date of this letter.

Please contact me if you have any questions regarding this submittal.

Very truly yours:


James J. Fisk
Director, Licensing

JJF/SAB/sjf
Attachments

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Justification for Proposed Change

ANSI N18.7 prescribes the requirement to perform biennial reviews of plant procedures. The intent is to ensure that existing procedures are periodically reviewed and revised as necessary to address the following elements which may have changed or come into existence.

1. Technical information
2. Industry experience
3. Plant behavior
4. Feedback based on use

Programmatic controls have been implemented at Arkansas Nuclear One which are equivalent or more effective in meeting this requirement from a technical and practical standpoint than the static biennial review process. These controls assess the procedural impact of the above listed elements and other elements prescribed by ANSI N18.7, utilizing a dynamic process, and account for the identification of the vast majority of revisions/changes to our procedures. Performing biennial reviews in addition to these controls is considered an overall weakness in our program by allowing for the postponement of required action and imposing a significant drain on plant resources without a commensurate improvement in plant safety.

Therefore, Arkansas Nuclear One proposes that the static biennial review commitment be replaced with an alternative commitment to review procedures upon identification of new or revised source material potentially affecting the intent of the procedure. Similar changes have been approved by the NRC for Grand Gulf Nuclear Station and Waterford-3 which are part of the Entergy Operations System.

It is our belief that the dynamic process is necessary to maintain procedures in an accurate and useful condition and is more responsive than the static biennial review process specified by ANSI N18.7.

Listed below are the major mechanisms that have been established at Arkansas Nuclear One which assess procedural impact and determine the need for review or revision of procedures.

Plant Design/Modification Program

The plant design/modification program requires an interface review of all modifications by groups which are potentially affected by the modification. This requires that all procedures potentially affected by the modification be identified and any necessary changes or revisions are made prior to closure of the modification package.

This proceduralized design document review process provides a mechanism for the assessment of design quality for design documents. In addition, one of the results of the feedback from this process is recommendations for revision of procedures.

User Feedback and Procedure Compliance

All Arkansas Nuclear One personnel are required to notify supervision when procedural guidance cannot or should not be followed. The procedure is then evaluated and, if required, changed prior to commencement of work.

Individual department disciplines are required to review changes to administrative level procedures to ensure that lower tier departmental procedure changes are made, if required.

Proceduralized feedback forms are utilized by Operations and Maintenance to capture improvements to procedures identified during use.

Routine assessments of Operations and Maintenance performance identify procedure deficiencies for correction or improvement.

Operator Requalification Training

Licensed operator training, a documented training program, makes frequent use of procedures. Resolution of noted discrepancies would result in procedure revisions.

Corrective Action Program

It is the responsibility of all Arkansas Nuclear One personnel to identify conditions adverse to quality, industrial safety, plant reliability, and radiological protection. The corrective action program includes Condition Reports, Radiological Incident Reports, and the Human Performance Enhancement System. Should inadequate procedures be identified, the appropriate department is actioned to change or revise the effected procedure in a timely manner.

Operating Experience Review

The industry operating experience review program has proceduralized controls established that require the review of NRC Information Notices, Significant Operating Experience Reports (SOER's), Operations and Maintenance Reminders (O&MR's), Significant Event Reports (SER's), vendor notifications through the ANO Vendor Equipment Technical Information Program (VETIP) and other regulatory and industry information (i.e., Nuclear Network, NPRDS SEE-IN, etc.) for applicability to Arkansas Nuclear One and for the determination of action required. These reviews include an evaluation of applicable procedures and identification of any needed revisions.

Quality Assurance

The Quality Assurance Program includes a review of procedures as part of its audit and surveillance process. Audits are conducted on a 6-month to 24-month basis as required by ANO Technical Specifications. The audits include a review of procedures to determine programmatic adequacy and implementation effectiveness. Resolution of comments and deficiency documents resulting from this process often result in procedure revisions.

License Document Changes/Commitment Management

Proceduralized controls are established that require Technical Specification amendments to be evaluated for impact on plant procedures. Procedures are changed accordingly.

Procedure controls are also in place that require incoming NRC correspondence, which may have procedural impact, be reviewed and evaluated for procedure revision.

The Commitments Management System at Arkansas Nuclear One is a comprehensive system, governed by administrative controls, utilized to track commitments including any associated implementing procedures. Action items concerning procedures are tracked until the procedures are revised or changed.

Plant Trending Process

Various groups at Arkansas Nuclear One currently implement trending programs. The trending process includes the collection of trend data which is indicative of equipment and personnel performance, evaluation of that data, and identification of follow-up actions necessary to improve equipment and/or personnel performance. Trending follow-up action for adverse trends may result in procedure changes and improvements.

Security/Emergency Planning

The security program and its implementing procedures are currently reviewed annually in accordance with the ANO Industrial Security Plan. The emergency preparedness program and its implementing procedures are reviewed annually in accordance with the Emergency Plan. These periodic reviews are not affected by this proposed change.

Drill/Exercise Critique

Proceduralized controls are established that require formal documentation of drill and exercise critiques. Deficiencies or recommendations noted are reviewed and used to update the affected procedures.

Emergency Operations Management Manual

Revisions to the Emergency Operations Management Manual Policies and Directives require affected departments to review and revise impacted procedures.

ATTACHMENT 2
PROPOSED CHANGE TO
AND QUALITY ASSURANCE
MANUAL OPERATIONS FOR
REMOVAL OF BIENNIAL
REVIEWS PER ANSI N18.7

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5.3.3

Procedures and instructions are to be reviewed no less than every two years; or prior to each use if utilized less frequently than once every two years; to determine if changes are necessary to meet NRG commitments and current ANO practices; *upon identification of new or revised source material potentially affecting the content of procedures, or prior to use if the procedure/instruction is not used routinely to determine if changes are necessary or desirable. Audits by the Quality Assurance Department are performed on at least a biennial basis to verify the effectiveness of controls used to maintain procedures current.*

Applicable procedures (i.e. those that relate to the incident cause) are to be reviewed following an unusual incident such as an accident, unexpected transient, significant operator error or equipment malfunction. Applicable procedures are also to be reviewed following any modification to a plant system.

5.3.4

Drawings related to plant changes and modifications are controlled as described in Section 3.0 and 6.0 of this manual.

5.4 CHANGES TO PROCEDURES

5.4.1

Changes or revisions to approved instructions, procedures and drawings are to be reviewed and approved by the same organizations or groups that performed the original review, unless otherwise noted in specific ANO procedures and controlled in the same manner as the original.

receive the same review and approval as the original documents.

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ANSI N18.7
(Section 5.2.15)

Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable.

Programmatic controls that are equivalent to or better than the biennial review process have been implemented at ANO. These programmatic controls are effected in an effort to ensure that procedures are reviewed for possible revision upon identification of new or revised source material potentially affecting the content of procedures, thereby maintaining the procedures current. Entergy Operations believes that this approach better addresses the intent of ANSI N18.7-1976 and is more acceptable from both a technical and practical perspective than a static two-year review process.