UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

FEB - 7 1996

Entergy Operations, Inc.
ATTN: Harry W. Keiser, Executive
Vice President & Chief Operating Officer
P.O. Box 31995
Jackson, Mississippi 39286-1995

SUBJECT: ENTERGY OPERATIONS, INC., ENGINEERING/MAINTENANCE PRESENTATIONS

This refers to the meeting conducted in the Region IV office on January 19, 1996. This meeting related to familiarizing Region IV personnel with changes in the engineering change control, maintenance, and commitment change processes. Your presentations were beneficial to our understanding of these programs and will contribute to our inspections in these areas. Specifically, we look forward to reviewing the new methods you have developed to respond to engineering requests. Such performance-based inspections will verify that the new process meets the design control requirements of 10 CFR 50, Appendix B.

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,

for Thomas P. Gwynn, Director
Division of Reactor Safety

Enclosures:
1. Attendance List
2. Licensee Presentation

Dockets: 50-313
50-368
50-416
50-458
50-382

Licenses: DPR-51
NPF-6
NPF-29
NPF-47
NPF-38

9602220237 960207
PDR ADOCK 05000313
P PDR

cc w/Enclosure 1: w/o Enclosure 2:
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Entergy Operations, Inc.
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Operations, River Bend Station
P.O. Box 220
St. Francisville, Louisiana 70775

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ATTN: Ross P. Barkhurst, Vice President
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Claiborne County Board of Supervisors
ATTN: President
Port Gibson, Mississippi 39150

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Frank Spencer, Asst. Attorney General
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ATTN: James J. Fisicaro, Director
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Entergy Operations, Inc.
ATTN: Donald W. Vinci
Licensing Manager
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Chairman
Louisiana Public Service Commission
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Parish President
St. Charles Parish
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Mr. William A. Cross
Bethesda Licensing Office
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Suite 610
Bethesda, Maryland 20814

bcc to DMB (IE45)
bcc distrib. by RIV:

bcc distrib. by RIV w/enclosures:

L. J. Callan
Branch Chief (DRP/C)
MIS System
RIV File
Project Engineer (DRP/C)
Branch Chief (DRP/D)
Resident Inspector (Waterford-3)
Senior Resident Inspector (Grand Gulf)
Senior Resident Inspector (Cooper)
Resident Inspector (Arkansas Nuclear One)
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
DRS-PSB
Branch Chief (DRP\TSS)
Resident Inspector (River Bend)
Project Engineer (DRP/D)

W/comments

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RIV:RI:MB		C:MB		C:EB	E	D:DRS	N		
CJPaulk cl		DAPowers		CAVanDenburgh		TPGwynn			
01/24/96		01/24/96		01/24/96		01/7/96			

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210130

11

bcc to DMB (IE45)
bcc distrib. by RIV:

bcc distrib. by RIV w/enclosures:

L. J. Callan
Branch Chief (DRP/C)
MIS System
RIV File
Project Engineer (DRP/C)
Branch Chief (DRP/D)
Resident Inspector (Waterford-3)
Senior Resident Inspector (Grand Gulf)
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RIV:RI:MB	C:MB	C:EB E	D:DRS		
CJPaulk	DAPowers	CAVanDenburgh	TPGwynn		
01/24/96	01/24/96	01/24/96	01/7/96		

OFFICIAL RECORD COPY

ENCLOSURE 1

ATTENDANCE LIST

1 LICENSEE PERSONNEL

1.1 Entergy

E. Rogers, Project Manager, Maintenance Support
F. Titus, Vice President Engineering
J. Yelverton, Chief Operating Officer

1.2 Arkansas Nuclear One

B. Allen, Maintenance Manager, Unit 1
S. Bennett, Licensing Engineer
M. Harris, Maintenance Manager, Unit 2
R. Lane, Director, Design Engineering
D. McKenney, Supervisor, System Engineering
D. Mims, Director, Licensing

1.3 Grand Gulf Nuclear Station

D. Bost, Director, Design Engineering
R. Moomaw, Maintenance Manager
L. Moulder, Technical Coordinator, Maintenance

1.4 River Bend Station

E. Ewing, Maintenance Manager
T. Leonard, Director, Design Engineering

1.5 Waterford Steam Electric Station, Unit 3

B. Azzarello, Director, Design Engineering
J. Hoffpauir, Maintenance Manager
C. Thomas, Licensing Supervisor

2 NRC PERSONNEL

J. Donohew, Project Engineer, Office of Nuclear Reactor Regulation
J. Dyer, Director, Division of Reactor Projects (DRP)
T. Gwynn, Director, Division of Reactor Safety (DRS)
P. Harrell, Chief, Project Branch D, DRP
C. Johnson, Reactor Inspector, Maintenance Branch, DRS
C. Paulk, Reactor Inspector, Maintenance Branch, DRS
K. Perkins, Director, Region IV Walnut Creek Field Office, DRP
D. Powers, Chief, Maintenance Branch, DRS
T. Reis, Acting Chief, Project Branch C, DRP
L. Smith, Reactor Inspector, Engineering Branch, DRS
C. VanDenburgh, Chief, Engineering Branch, DRS

ENCLOSURE 2

Entergy Operations, Inc.

Engineering Request Process

January 19, 1996

Engineering Request Process

- Introduction / Purpose
- Background / Approach
- New Process Attributes
- Implementation Status / Plans
- Discussion / Questions

ENTERGY

The Basis for Change

- Increase Focus on Plant Safety and Performance
- Improve Human Performance
- Reduce Costs While Maintaining High Safety Standards
- Standardize Engineering Processes to Enhance Sharing of Resources

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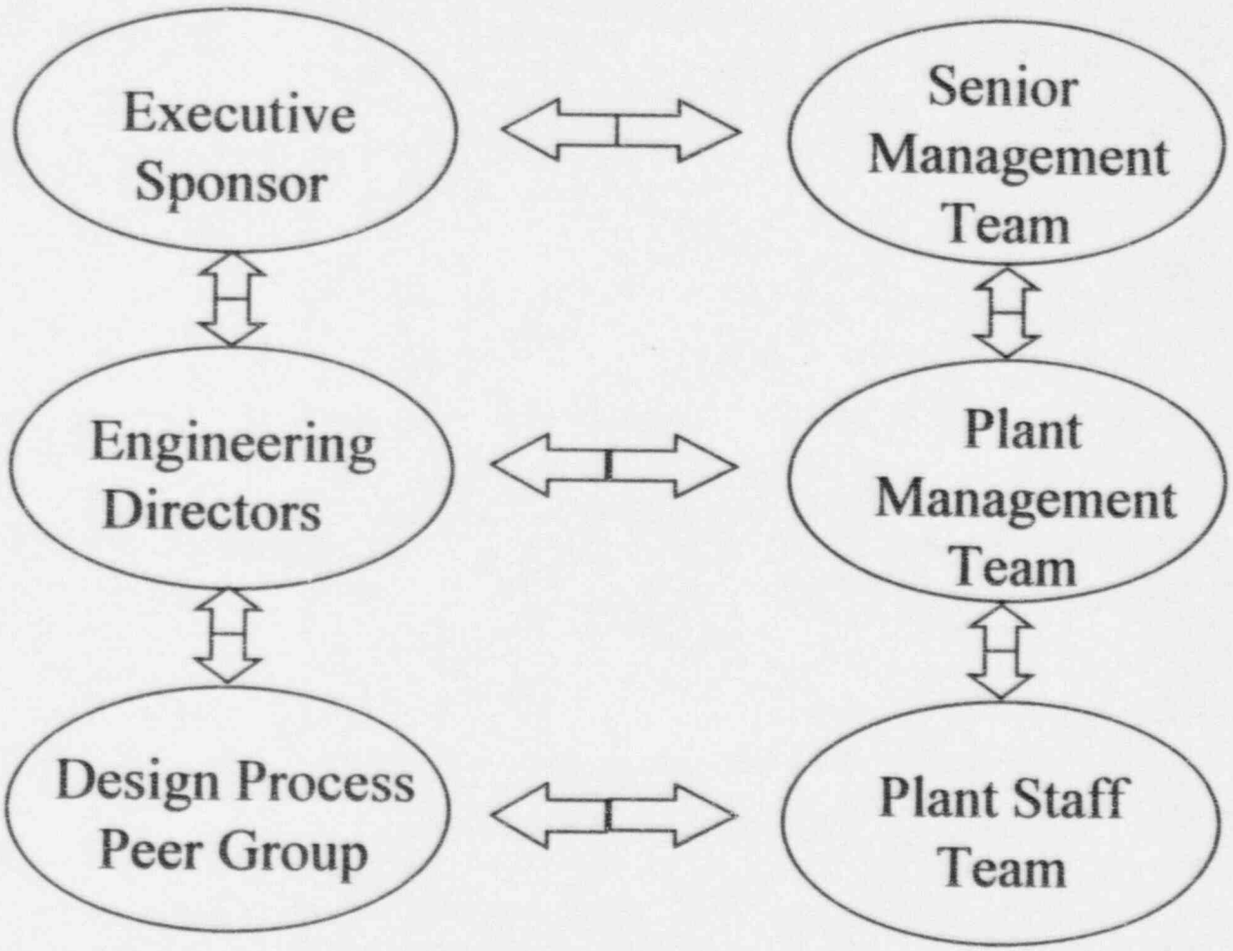
Approach



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Peer Group Approach

- Restraints / Guiding Principles
  - Enhance Safety
  - Compatible with 10CFR50 Appendix B / Regulatory Requirements
- Industry Initiatives / Experience
  - EPRI Guidelines
  - Benchmarking
- Independent Thinking

ENTERGY

Attributes of the New Process

- One Request
- Utilization of Engineering Screening
- Graded Approach
  - Engineering Reply
  - Administrative Change
  - Commercial Change
  - Engineering Evaluation
  - Nuclear Change
- Timely Responses

ENTERGY

Engineering Reply

- Provides an answer to a question
- Interprets / communicates existing requirements
- Does not change existing plant configuration or documentation
- Examples:
  - Clarification on a technical issue
  - Communication of the results of a project scoping study

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Administrative Change

- Editorial and Non-Technical Changes
- Correction of Discrepancies
  - Obvious (e.g., spelling, typo, number corrections, etc.)
  - Discrepancies between design documents where evaluation is not required
- Examples:
  - Correct errors of omission (where necessary information can be obtained from another approved design document)
  - Add clarification without changing intent

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Engineering Screening

- Ensures Design Bases & Programmatic Commitments are Considered / Addressed
- Identifies Required Inputs & Reviews
- Results in:
  - Graded level of documentation
  - Reduction in unneeded reviews
  - Programmatic screening performed early in process

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Commercial Change

- Commercial Equipment Criteria
  - Not Safety Related
  - Minimal Impact to SAR
  - Not Subject to Special Considerations (e.g., trip or transient sensitive)
  - Controlled by Design Engineering
- Streamlined Documentation
- Appropriate Level of Reviews
- Installation Flexibility
- Appropriate Configuration Control
- Potential Examples:

- Turbine building crane
- Heat exchanger maintenance valves
- Remote annunciator panels
- Turbine building ventilation

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Engineering Evaluation

- Provide design information that does not exist elsewhere for an existing SSC
- Evaluate conditions that do not conform to existing design documents
- No addition or deletion of SSCs
- Examples:
  - Evaluate repair methods
  - Evaluate part / equipment substitutions
  - Evaluate technical issues not within the scope of the Reply or Administrative Change response types

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Nuclear Change

- Additions or deletions of SSCs not classified as commercial
- Changes to plant configuration beyond the scope of an Engineering Evaluation or Commercial Change
- One process for major & minor Nuclear Changes
- Graded documentation and review based on engineering screening results
- Examples:
  - Addition of a new feedwater control system
  - Safety related piping additions

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Documentation Requirements

	Engineering Reply	Administrative Change	Commercial Change	Engineering Evaluation	Nuclear Change
ER Form	X	X	X	X	X
Response	X	X	X	X	X
Reference Information (as needed)	X	X	X	X	X
Design Document Review (for impact)		X	X	X	X
Engineering Review		X	X	X	X
Engineering Screening			X	X	X
Engineering Approval			X	X	X
Engineering Instructions			X	X	X
10CFR50.59			X	AR	X
ANSI Design Inputs				AR	AR
ANSI Independent Verification				AR	AR

X - Required AR - As Required

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Implementation Plan & Status

- Guidelines and Site Specific Procedures
- Training
- Self Assessment

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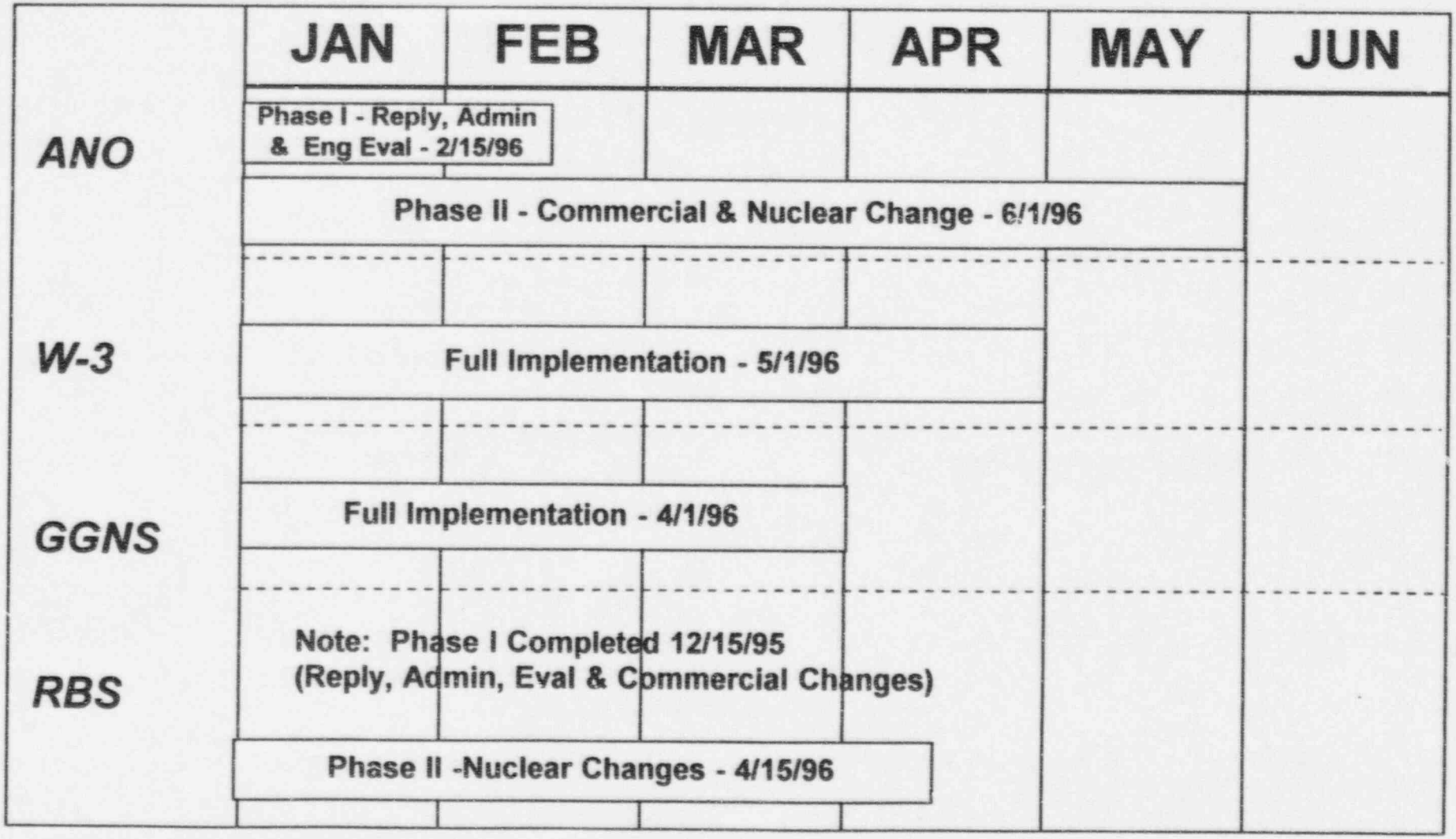
Implementation Status



Entergy Operations
Integrated Maintenance Program

ENTERGY

The Need for Change

- Create an Entergy Operations standard
- Reduce costs while maintaining a high safety standard
- Reduce the administrative burden
- Lay a foundation for sharing resources and good practices
- Streamline the maintenance process

Vision

Entergy Operations Maintenance will be a multi-site integrated team achieving high plant availability and equipment reliability in a safe and cost efficient manner. Through innovative thinking and aggressive change, Maintenance will play an increasing role in the new environment

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Integrated Maintenance Program

- Maintenance process will be common at all EOI sites
- Administrative guidance will be common at all EOI sites
- Expectations for work practices will be common at all EOI sites

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Development Process

- Maintenance Managers planning meetings
- Key Process Team
- Thorough review of industry standards
  - Appendix B QA programs
  - Regulatory Guides/ANSI Standards
    - Primarily RG 1.33/ ANSI N18.7
  - INPO standardized processes
- Benchmarking

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Major Requirements

- Permanent Records
  - Activity affects safety function
  - Work on EQ or ASME
  - Activity changes plant configuration
  - Activity required by Tech Specs
  - Activity is otherwise considered significant
- Procedure Required
  - Activity is beyond the skill of the craft
  - Activity is complex
  - Activity could cause a plant trip or safety system actuation
  - Regulatory requirement (RG 1.33)

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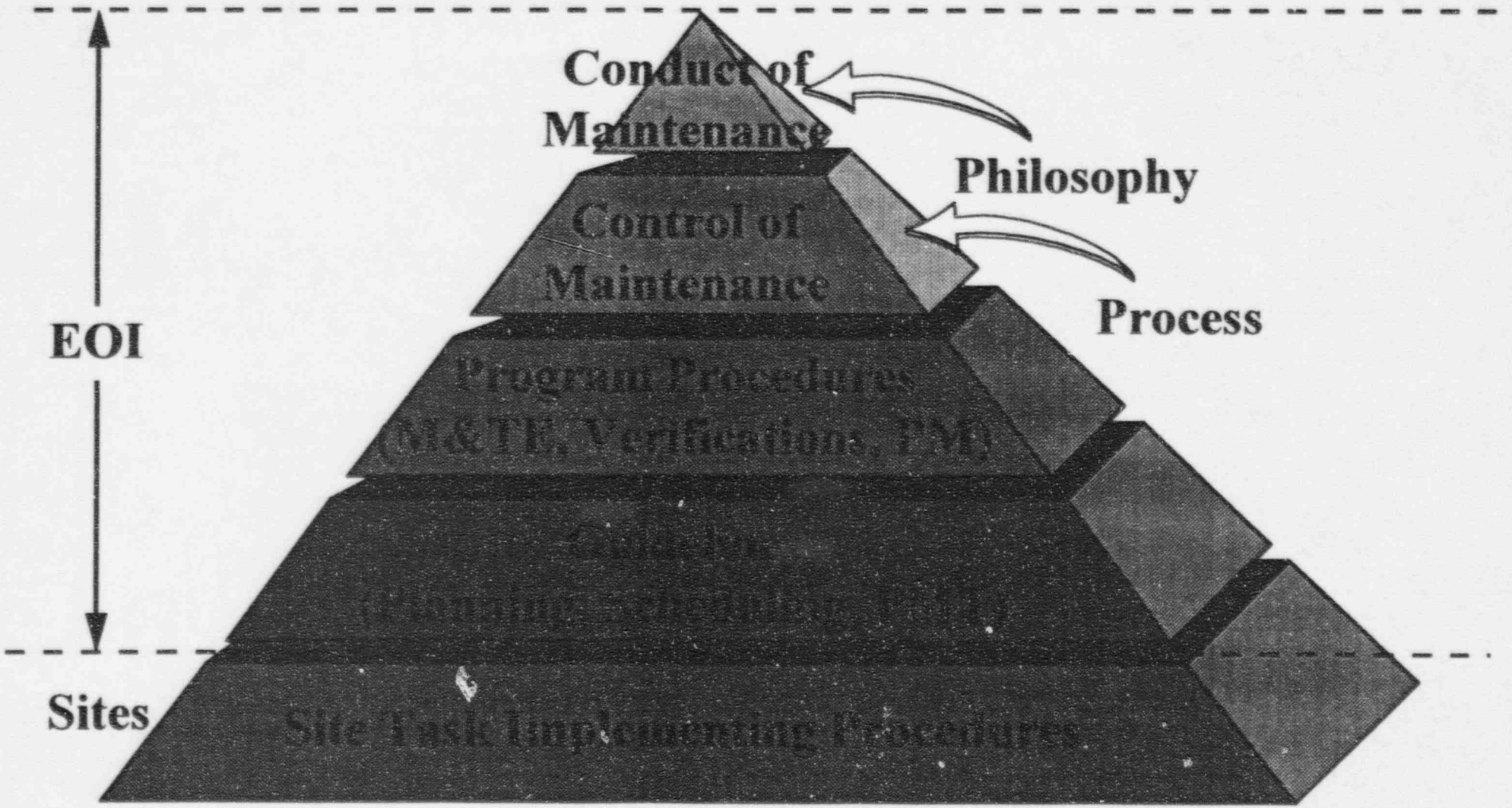
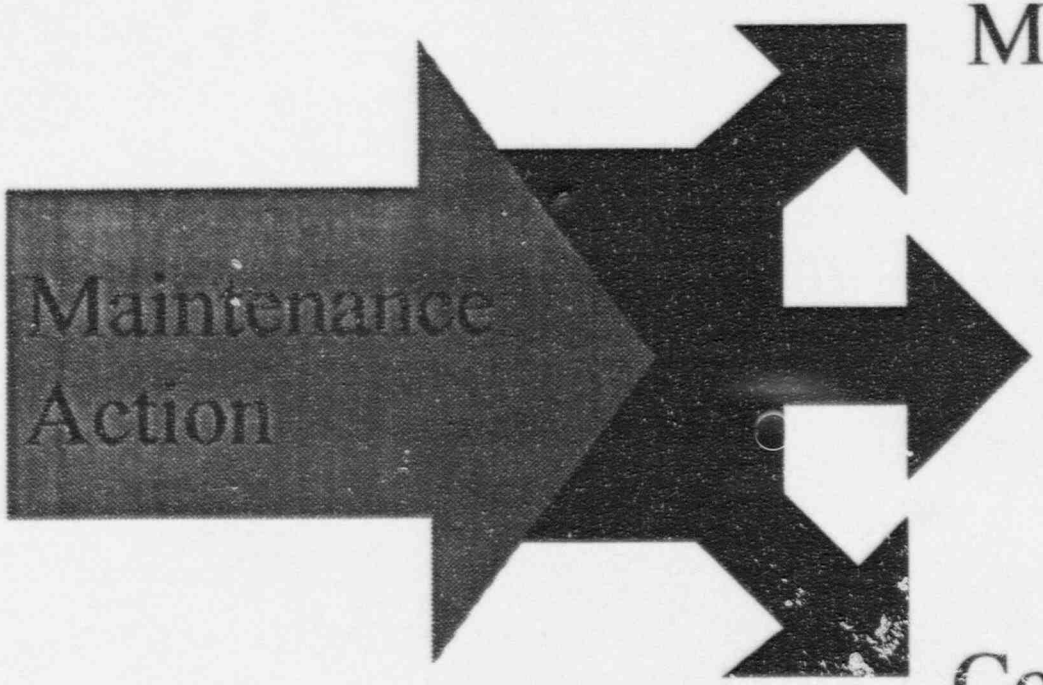
Program Structure



Work Control Spectrum



Minor Maintenance

Reference Package

Compliance Package

Applies to Corrective Maintenance and Repetitive Tasks

Minor Maintenance

- Does not require a record that will be retained in permanent plant files
- Activity does not require written procedure or instructions
- Worker expected to use appropriate resources
- Record of work maintained in electronic database as appropriate

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Examples

- PM on BOP equipment
- Tighten tubing fittings
- Packing adjustments
- Replace annunciator cards
- Replace a pressure indicator

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Reference Package

- Record will be maintained in permanent plant files
- Activity does not require written procedure or instructions
- Worker expected to use appropriate resources

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Examples

- Safety related MOV limit switch adjustment
- Replace disc on manual valve
- Minor PM on safety related equipment
- EQ elastomer replacement
- Replace a circuit board

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Compliance Package

- Record will be maintained in permanent plant files
- Activity requires written procedure or work instructions
- Current practice for virtually all work

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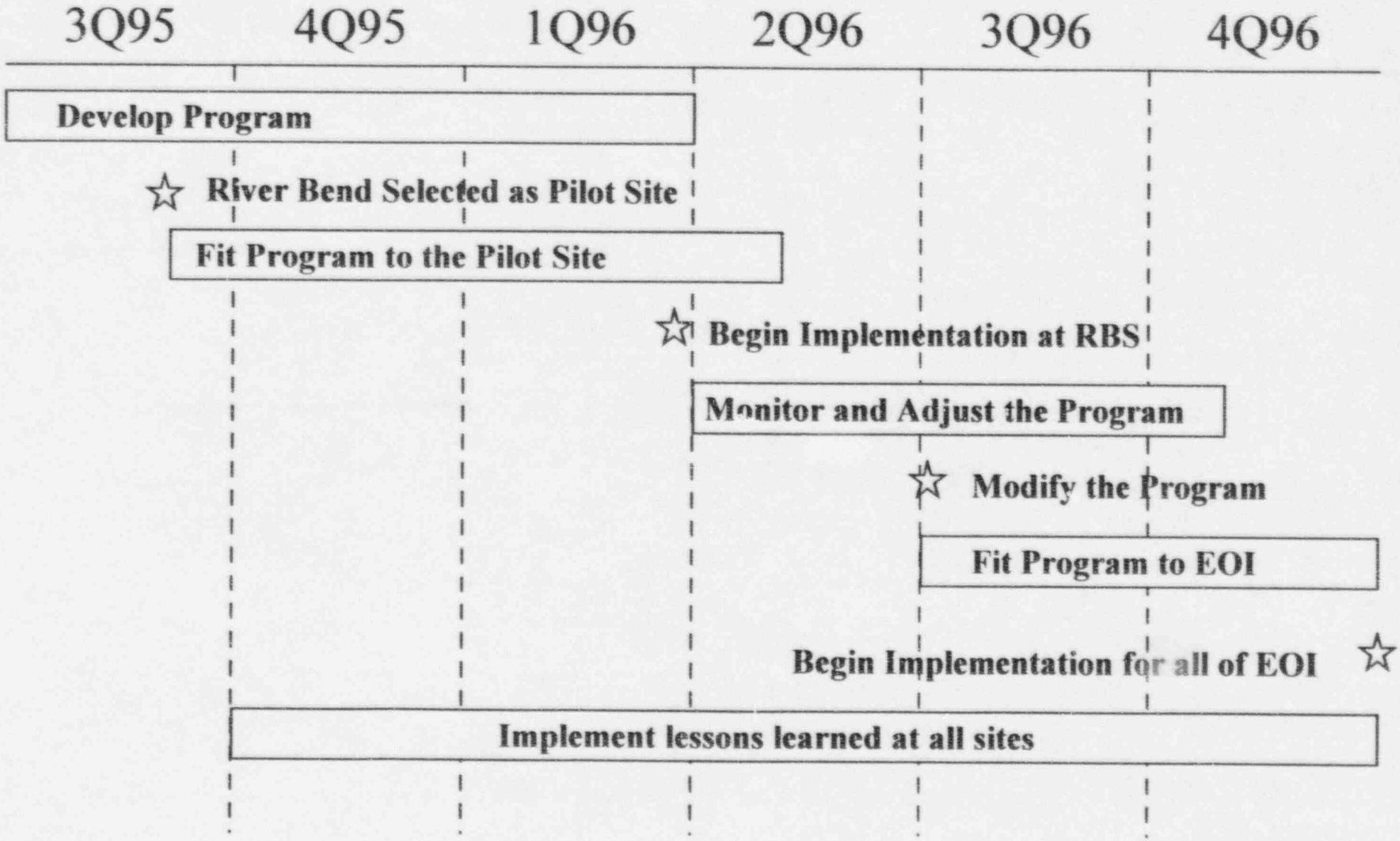
Major Considerations

- Integration of procedures and guidelines
- Retain the good practices and strengths
- Implementation of Maintenance Rule
- Commitment changes
- Plant Review Committees
- Training
- Check and Adjust

Implementation Schedule



Summary

- Common guidance for Maintenance
- Graded process based on fundamental requirements
- Implementation process beginning this year

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Commitment Change Process

ENTERGY

ENDORSED BY THE NRC

NRC Input

Pilot Program

SECY Paper

ENTERGY

FIVE STEP DECISION PROCESS

Change Process Codified ?

Change Significant to Safety ?

Commitment Necessary for Compliance ?

NRC Relied Upon Original Commitment ?

Commitment Minimizes Recurring Condition ?

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DECISION STEP 1

Change Process Codified ?

- YES, Apply Codified Process
- NO, Proceed to Decision Step 2

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DECISION STEP 2

Change Significant to Safety ?

- YES, Apply 10CFR50.92 Criteria
- NO, Proceed to Decision Step 3

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DECISION STEP 3

Commitment Necessary for Compliance to Obligation?

- YES, Change Preserves Compliance ?
- NO, Proceed to Decision Step 4

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DECISION STEP 4

NRC Relied Upon Original Commitment ?

- YES, Original Commitment Implemented ?
- NO, Proceed to Decision Step 5

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DECISION STEP 5

Commitment Minimizes Recurring Condition ?

- YES, Needed to Minimize Recurrence ?
- NO, Change Commitment

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REPORTS AND DOCUMENTATION

Timely Notification

Periodic Reports

Documentation

Issue Sensitivity

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EXPERIENCE AT ENTERGY OPERATIONS

Waterford 3

River Bend Station

Grand Gulf Nuclear Station

Arkansas Nuclear One

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SUMMARY

Endorsed by NRC

Five Step Decision Process

Experience at Entergy Operations

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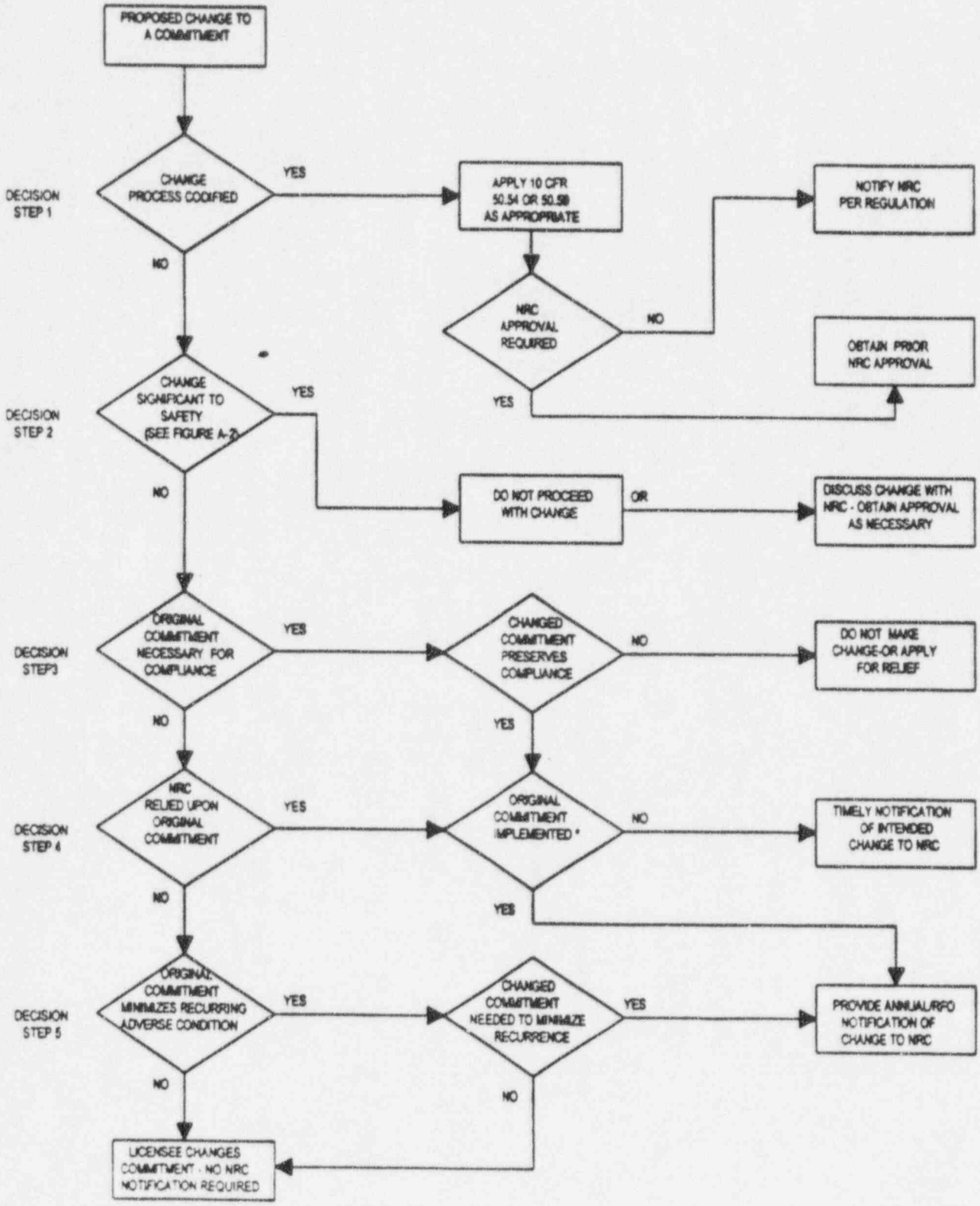
FIGURE A-1
COMMITMENT MANAGEMENT CHANGE PROCESS



* FOR LONG-TERM CORRECTIVE ACTION COMMITMENTS MADE IN RESPONSE TO A NOTICE OF VIOLATION, SEE PAGE 10

FIGURE A-3
COMMITMENT EVALUATION SUMMARY

Original Commitment Description: _____

_____

_____

Source Document: _____ **Tracking Number** _____

Revised Commitment Description: _____

_____

_____

Summarize Justification for Change: _____

_____

_____

1. Is a codified commitment revision process applicable and completed (i.e., 10 CFR 50.59, or 10 CFR 50.54)?

   ____ No. Continue with STEP 2.

   ____ Yes. EXIT PROCESS*. Use codified process.

2. Could the change negatively impact the ability of an SSC to perform its safety function or negatively impact the ability of licensee personnel to ensure the SSC is capable of performing its intended safety function?

   ____ No. Continue with STEP 3. Briefly describe rationale: ** _____

   _____

   _____

   ____ Yes. Perform a safety evaluation using 10 CFR 50.92 criteria and attach a copy. Does a significant hazards consideration exist?

   ____ Yes. EXIT PROCESS*. Do not proceed with revision, OR discuss change with NRC and obtain any necessary approvals.

   ____ No. Continue with STEP 3.

3. Was original commitment necessary for compliance with an **Obligation** (i.e., rule, regulation, order or license condition)?

   ____ No. Continue with STEP 4.

   ____ Yes. Does the revised commitment preserve compliance?

   ____ No. EXIT PROCESS*. Do not make change, OR apply for appropriate regulatory relief.

   ____ Yes. Briefly describe rationale:** _____

   _____

   _____

3. (Continued)
Has the original commitment been implemented?

____ No. EXIT PROCESS*. Provide timely notification of revised commitment to NRC.

____ Yes. EXIT PROCESS*. Notify NRC of revised commitment in next annual/RFO interval summary report.

4. Was the original commitment (1) explicitly credited as the basis for a safety decision in an NRC SER, (2) made in response to an NRC Bulletin or Generic Letter, (3) made in response to a request for information under 10 CFR 50.54(f) or 10 CFR 2.204, or, (4) identified as a long term corrective action in response to a NRC Notice of Violation?

____ No. Continue with STEP 5.

____ Yes. Has the commitment been implemented? (see page 11 of the guidance if the commitment was made in response to a Notice of Violation.)

____ No. EXIT PROCESS*. Provide timely notification of revised commitment to NRC.

____ Yes. EXIT PROCESS*. Notify NRC of revised commitment in next annual/RFO interval summary report.

5. Was original commitment made to minimize recurrence of an adverse condition (i.e., a long-term corrective action stated in a LER)?

____ No. Change commitment. No NRC notification required.

____ Yes. Is the revised commitment necessary to minimize recurrence of the adverse condition?

____ No. Briefly describe rationale**: _____

_____

_____.

Change commitment. No NRC notification required.

____ Yes. Notify NRC of revised commitment in next annual/RFO interval summary report.

*EXIT PROCESS means the balance of this summary is not to be completed.

** Attach additional sheets providing rationale, if necessary.