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

DEC 29 1995

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

SUBJECT: GRAND GULF PERFORMANCE-BASED AUDITS MEETING - REVISED SUMMARY

This meeting summary was revised to include the correct slides in Enclosure 2, Licensee Presentation. The previous summary may be replaced in its entirety.

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 identifying those activities that will require increased or decreased auditing because of identified performance weaknesses or strengths, respectively.

From the presentation we concluded that your staff had expended a significant amount of resources to develop a well thought out process that should apply your resources more appropriately to those items that have the 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,

JEDyer

J. E. Dyer, Director
Division of Reactor Projects

Enclosures:
1. Attendance List
2. Licensee Presentation

IE01
1/1

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DEC 29 1995

bcc to DMB (IE01)

bcc distrib. by RIV:
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Branch Chief (DRP/D)
MIS System
Project Engineer (DRP/D)
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Resident Inspector
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
RIV File
Branch Chief (DRP/TSS)
RSLO

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GAPick		PHHarrel		JEDyer					
12/25/95		12/28/95		12/29/95					

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GAPick		PHHarrel		JEDyer			
12/29/95		12/28/95		12/29/95			

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MEETING: PERFORMANCED-BASED AUDITS BY GRAND GULF

DATE: 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. PETRISINE	NRC/NRR/DRCH	QA SPECIALIST
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PAUL C. CONNOR	NRC/NRR/DRPW/PD4-1	PROJECT MANAGER
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T. P GWYNN	NRC RIV	DIRECTOR, DRS
GEORGE A. ZINKE	ENTERGY RIVER BEND	MANAGER QA
MIKE LAMSON	ENTERGY / GRAND GULF	SR LICENSING SPEC.
CINDY HAYES	EOI GRAND GULF	DIRECTOR, QUALITY
JIM REAVES	ECI GRAND GULF	TECHNICAL SUPERV., QUALITY
JEFFREY RICHARDS	EOI - GENERAL MANAGEMENT	CONSULTANT - NUCLEAR SAFETY & LICENSING
MIKE MEAN	ECI - GRAND GULF	DIRECTOR NUCLEAR SAFETY & REGULATORY AFFAIRS
DAN PACE	ECI - GRAND GULF	GEN MANAGER-GGNS
BOB GRAMM	NRC/NRR/DRCH	QA SECTION CHIEF
JIM LYNCH	SEA INC. CONTRACT SUPPORT NRR QA	VICE PRESIDENT
CHARLES L DAVIS	ENTERGY	MANAGER NUCLEAR OVERVIEW
DAVE MCAFEE	TU ELECTRIC (CORPORATE QA)	MGR REG COMPL
Kenneth Hughey	EOI	Dir. Ops Support
John Fowler	ECI - River Bend	QA Supv.
Rick J. King	EOI - Arkansas Nuclear One	Supv, Licensing
A. CARTER ROGERS	ARIZONA PUBLIC SERVICE - PALO VERDE	TECH ASSI. NUCLEAR AFFAIRS
Stephen D. Floyd	Nuclear Energy Institute	Dir, Licensing + Perf-Based Regs.
ADRIAN HEYMER	NUCLEAR ENERGY INSTITUTE	PROJECT MGR

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 — Curtiey Hayes
- River Bend approach — George Zinke

Introduction

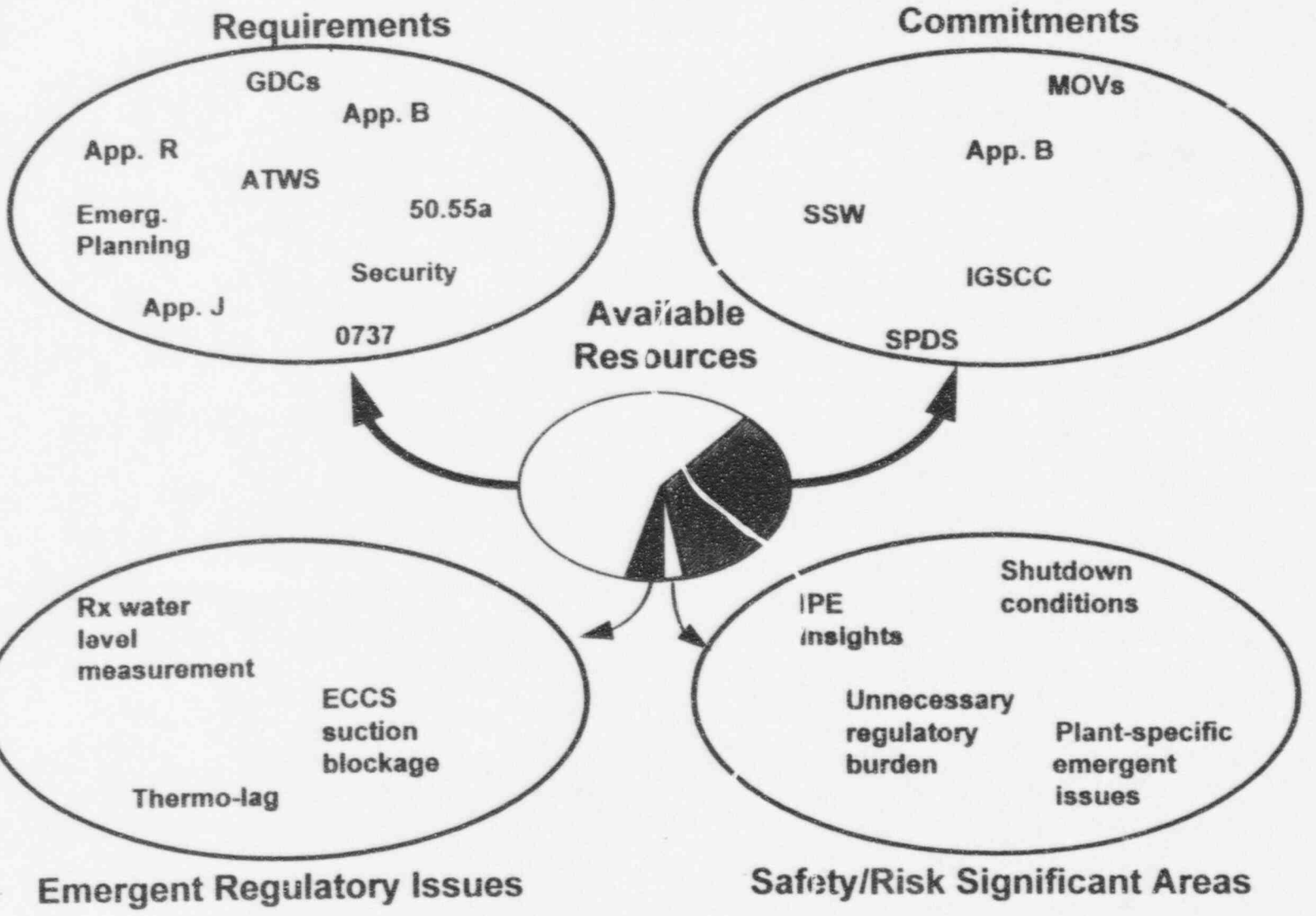
Overview

- 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 <u>what</u> to audit, <u>not how</u> 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

CONCURRENCE REVIEW FORM

SECTION I

GNRO-95/00119 Rev. ___

RESPONSE DUE: NONE
(NRC Target)

SUBJECT: Operational Quality Assurance Manual Change

M. J. Larson
NRC Document Preparer

11/6/95
Date

R. W. Byrd
Responsible Section Manager/Superintendent

11/6/95
Date

Commitment Concurrence

SECTION II

Locations	Commitment	Responsible Organization Primary/Secondary	Due Date
	See Attached mark-ups	Quality Programs	NONE

This letter contains commitments requiring procedural implementation
YES (X) NO ( )

UFSAR Potential Impact Classification

SECTION III

UFSAR Impact: No X Yes ____

If Yes:

A) List UFSAR sections/tables/figures affected and describe nature of UFSAR _____

B) UFSAR revision affected: Current _____ Future _____

C) Additional comments: _____

SECTION IV

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

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:

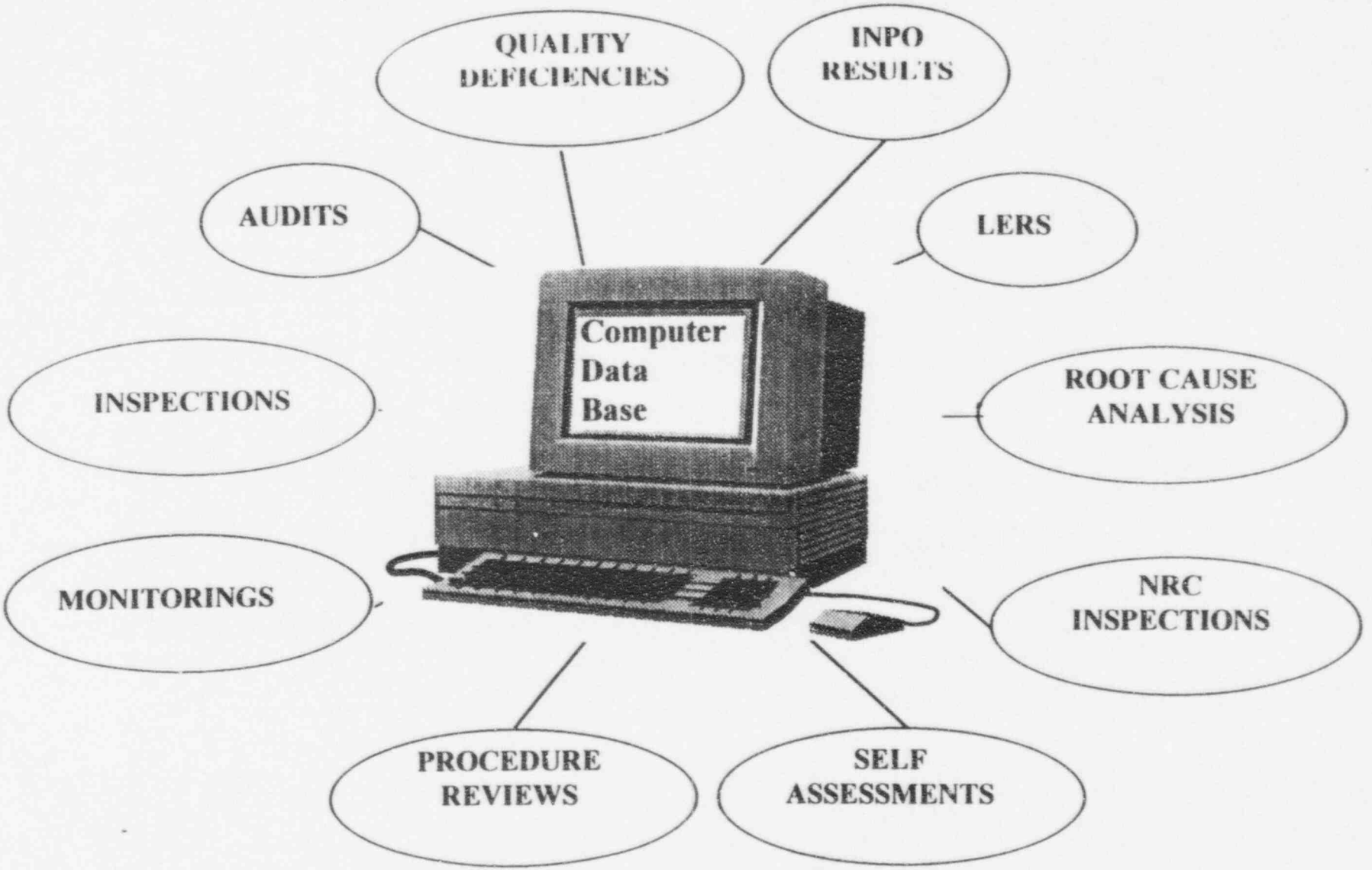
- **Activities to be Audited**
- **Items to Inspect**
- **Procedures to Review**
- **Areas to Monitor**
- **Declining Performance Trends**

PROGRAM CHANGES

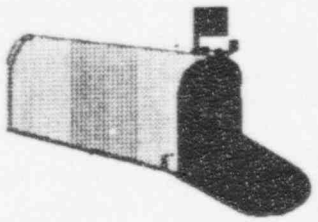
ELIMINATE/REDUCE:

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

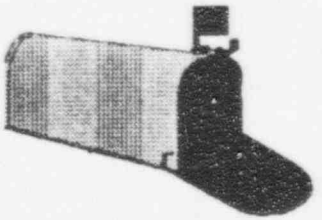
INFORMATION FACTORED INTO DATA BASE



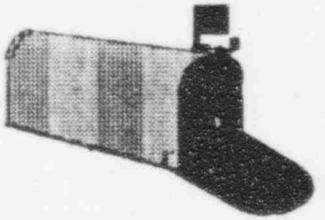
ACTIVITY CODE MAILBOXES (TOTAL 449)



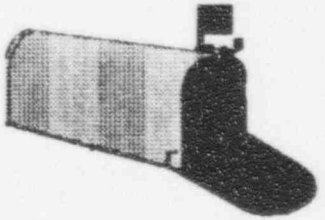
CONFIGURATION MANAGEMENT (CODE 38)



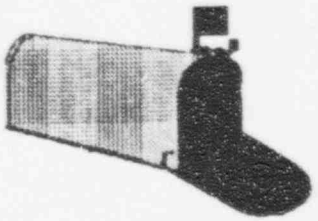
TEMPORARY ALTERATIONS (CODE 146)



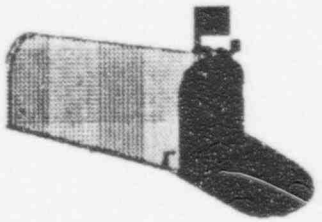
TURNOVER (CODE J59)



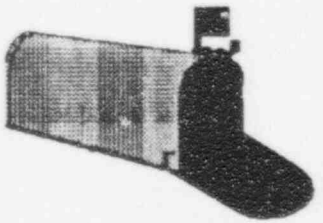
TEAM WORK (CODE J6)



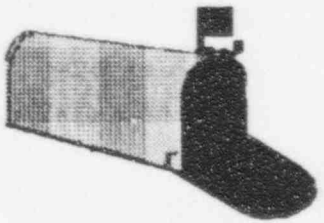
ATTENTION TO DETAIL (CODE 24)



MATERIAL UTILIZATION (CODE 72)



CLEARANCE/ PROTECTIVE TAGGING (CODE 143)



VALVE OPERATION (CODE C17)

ACTIVITY CODES

Attachment C

Chemistry/Environmental	B
Reg Guide 4.15	B1
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
Water Chemistry	B9

Computer Software	X
Software Classification	X1
Software Documentation	X2
Software Maintenance	X3
Database Changes	X4
Database Control	X5
Computer Equipment	X6

Corrective Action Process	15
Nonconformances Identified	151
Nonconformance Process	152
Items Segregated	153
Nonconformances Tagged	154
Deficiency Dispositioned	155
Employee Concerns Problem	156
Corrective Actions Identified	157
Action to Prevent Recurrence	158
Root Cause Analysis	159

Design Control	3
Suitability of Application	31
Minor Change Packages	32
Design Change Packages	33
Design Change Notices	34
Temporary Alterations	35
Calculations	36
Modification Implementation	37
Configuration Management	38
Equipment Qualification	39
Engineering Standards	310
Seismic Qualification	311
Environmental Qualification	312
Design Criteria	313
Evaluation Request (PER/EER)	314

Document Control	6
Drawing Control	61
Procedure Control	64
Vendor Manual Control	66
Document Updates	67
Periodic Review	68
Specifications/Standard Control	69
Engineering Calculation Control	610
Operating License Control	611
UFSAR Control - TRM	612
Correspondence Control	613
Q-List Control	614

Emergency Preparedness	D
EP Equipment	D1
Event Classification	D2
Off-Site Agency Interface	D3
Drill Control/Critique/Exercise/EP	J91
Emergency Operating Procedure	D6

Fire Protection	F
Combustible Storage/Control / Ventilation /Permit/Transit	F1
Exit Markings/Unobstructed	F2
Emergency Lighting	F3
FP Equipment/Structures	F4
Weld/Grind Permit	F5
Fire Watch/Knowledgeable/Duties	F6
Charged Fire Extinguisher With Fire Watch	F63
Drill Control/Critique/Exercises/Fire	J92
Compensatory Measures	F8
Fire Pre Plans	F9
FP Stations have Unobstructed Access	F10
Fire Brigade Equipment Properly Stocked	F11

General Codes	
Access Control	J1
Access Control/HP	J11
Access Control/Security	J12
Access Control/Control Room	J13
Communications/Interface	J2
Attentiveness	J3
Professionalism	J4
Turnover	J5
Teamwork/Coordination Between Groups	J6
Supervision Oversight/General Oversight	J7
Pre Job Briefing/Planning	J8
Pre Job Briefing/Planning/HP	J81
Pre Job Briefing/Planning/Plant Personnel	J82
Drill Control/Critique/Exercises	J9
Drill Control/Critique/Exercises/EP	J91
Drill Control/Critique/Exercises/Fire	J92
Drill Control/Critique/Exercises/Security	J93
Required Support Personnel Available	J100
Physical Exams/Medical Status	J110
Contractor Control	J120
Periodic Reports	J121
Shift Manning/Staffing	A3

Handling/Storage/Shipping	13
Handling	131
Storage/Proper Level	132
Shipping	133
Frequent/Periodic Crane Inspections Current	134
Environmental Storage Conditions maintained	138
Storage Buildings /Areas Maintained	139

ID & Control of Material	8
Material/Part Traceability	81
Material/Part Tag/Marking	82

ACTIVITY CODES

Attachment C

Inspections	10
Independent Verification	101
Inspections Specified	102
Acceptance Criteria Specified	104
In service Inspection	105
Inspection Technique	106
Performed to Code	107
Correct Documentation (C of C. CMTR. etc.)	108
Results Properly Documented	109
Quality Mechanical Inspections	10M
Dimension Verification	10M1
Torquing	10M2
Alignment	10M3
Cleanliness/Internal Inspection	10GC4
Inspection of Piping for Damage	10M5
Machining Before and After Measurements	10M6
Material/Part Traceability	81
Location and Orientation of Components	10M8
Fluid Levels and Pressures	10M9
Leakage	10M10
Material/Equipment Conditions	P1
Transfer of Heat Numbers	10M13
Lubricants and Oils	10M14
Quality Welding Inspections	10W
Joint Fit Up/Preparation	10W1
Preheat/Interpass temperature	10W2
Type Filler Material/Rod Slip Verification	10W3
Welder Qualification	10W4
Weld Location	10W5
Post Weld Heat Treatment	10W6
Civil Quality Inspections	10C
Concrete/Grout Preplacement	10C1
Concrete/Grout placement	10C2
Concrete/Grout Post Placement	10C3
Concrete Field Tests	10C4
Grout Field Tests	10C5
Compressive Strength Tests	10C6
Soil Backfill Operations	10C7
Soil Density Tests	10C8
Soil Classification Tests	10C9
Penetration Location	10C10
Damming	10C11
Shelf Life Current	75
Placement of Equipment	10C13
Equipment Labeling/Identification	P4
Cleanliness	10GC3
Filling Process	10C16
Density of Material	10C17
Expansion Anchor Installation	10C18
Quality Coating Inspections	10P
Substrate Preparation	10P1
Surface Free of Moisture	10P2
Batch and Lot No	10P3
Surface Temperature	10P4
Dew Point	10P5
Relative Humidity	10P6
Paint Temperature at Mixing	10P7
Proper Cure/Start Time	10P8
Dry Film Thickness	10P9
Wet Film Thickness	10P10
Total Area of Coated Surface	10P11
Quantity of Coatings Applied	10P12
Holiday Detection	10P13
Quality Electrical Inspections	10E
Lifting and Landing Leads	10E1
Cleanliness/Electrical	10GC1
Divisional Separation	10E3
Cable Routing	10E4
Crimping	10E5
Leveling and Alignment	10E6
Clearances and Tolerances	10E7
Tightness of Connections	10E8
Freedom of Movement	10E9
Polarity	10E10
Grounding	10E11
Torquing	10M2
Wiring Continuity	10E15
Scheme Checks	10E16
Location and Routing	10E17
Hi Pot Testing	10E18
Meggering	10E19
Cable Pulling	10E20
Cable Splicing	10E21
Cable Termination	10E22
Electrical Insulation	10E24
Quality I&C Inspections	10N
Flow Measurements	10N1
Calibration	126
Level Measurements	10N3
Temperature Measurements	10N4
Pressure Measurements	10N6
Wire Termination	10N7
Material/Part Tag/Marking	82
Instrument Line Slope	10N11
Quality Receipt Inspection	10R
Physical Damage	10R1
Cleanliness/Receipt	10GC2
Coatings and Preservatives	10R3
Desiccant	10R4
Protective Covers and Seals	10R5
Inert Gas Blanket	10R6
Workmanship/Good Practices	10R7
Physical/Chemical Properties	10R8
General Inspection Items	10G
General Inspection Item Cleanliness	10GC
Cleanliness/Electrical	10GC1
Cleanliness/Receipt	10GC2
Cleanliness/Civil	10GC3
Cleanliness/Internal Inspection	10GC4

ACTIVITY CODES

Attachment C

Inst/Proc/Drwg	5
Work Instruction Adequate	51
Work Instruction Adherence	52
Work Instruction Authorization	53
Post Work Testing\Specified	H11
Acceptance CRITERIA Specified	104
Procedure/Surv Adequate	56
Procedure Review Authors Guide	56A1
level of use indication	56A2
checklist I or II complete	56A3
cross discipline review blank checked and initialed	56A4
cross discipline review	56A5
current revision statement	56A6
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
Technical	56B1
paragraph references	56B2
attachments	56B3
data sheet steps and procedure steps agree	56B4
accomplishment of step as written could create an error	56B5
TCN / ACN	56B6
referenced procedure / documents are in effect	56B7
equipment / location ID	56B8
technically inaccurate step or process	56B9
procedure per Tech Spec / TRM	56B10
Editorial	56C1
procedure typed as submitted	56C2
procedure steps are clearly written (fog index)	56C3
spelling	56C4
typo's, missing words, grammatical errors	56C5
sentence needs to be rewritten for clarity	56C6
Quality requirements	56D1
Upper-tier requirements included/complete	56D2
commitment cross-reference	56D3
quality requirements (acceptance/ rejection criteria)	56D4
lack of procedure	56D5
No Comments	56E
Enhancement	56F
Procedure Adherence	57
Incorporation of TS Changes into Surveillance s	58
Procedure Approval	59
Process to Keep Procedures/Program Current	510
Required Reviews Performed	511
Sad Sheet Approved (Scram Avoidance)	512
Current Revision of Procedure/Data Sheets	513
User Friendly/Human Factors	514
Impact/Scope Statement	516
Proper Permits With Work Package	517
Licensing	U
NUREG 0737 Operational Feedback	U1
Licensing Conditions	U2
10CFR50.54/10CFR50.59 Screening /Evaluations	U3
Reportable Occurrences (LER / IR)	U4
Information Posting	U5
Probility Risk Assessment (PRA)	U6
Maintenance Activities	H
MOV Testing	H1
Erosion Corrosion	H2
Fastener/Locking Device	H3
Lubrication Program	H4
Tool Utilization/Control Effectiveness	H5
Proper Tools and Equipment Available and Used	H51
Contaminated Tools Utilized Where Possible	H53
Planning/Scheduling	H6
Equipment Maintenance	H7
Maintenance Backlogs	H8
Equipment Monitoring	H9
Foreign Material Exclusion Controls	H10
Post Work Testing\Specified	H11
Job Restoration	H12
Troubleshooting	H13
Flushing/Hydrolasing	H14
Maintenance Rule	H15
Refueling Activities	H16
Nuclear Plant Reliability Data System (NPRDS)	H17
Material Control	7
Receipt Control	71
Material Utilization	72
Materials Available	73
Materials Properly Staged	74
Shelf Life Current	75
Heat Number Traceabilty	76
Turnaround Document Attached	77
Unused Materials Returned/Proper Disposal	78
Fraudulent Materials	79
Substitute Parts	710
M&TE Control/Equipment Calibration	12
Calibration/Proper Range and Type	121
Calibration Records	122
Calibrated Equipment Utilization	123
Logs/Records/Traceability	124
M&TE Nonconformance Reports	125
Calibration of Permanent Plant Equipment	126

ACTIVITY CODES

Attachment C

Plant Conditions	P
Material/Equipment Conditions	P1
Housekeeping	P2
Freeze Protection	P3
Equipment Labeling/Identification	P4
Plant Operations	C
Alarm Response	C1
Conduct of Operations	C2
Operator at Controls	C5
Notif/Documentation of Significant Events/ Conditions	C7
Operability	C11
RO/SRO Log/Records	C12
Operator Rounds	C14
Breaker Operation	C15
Control Rod Operation/ Reactivity Control	C16
Valve Operation	C17
Shutdown Cooling	C18
Switch/Relay/Contacts	C19
Thermal Performance	C20
Turnover	J5
Trainee Control	T15
Out of Service Instrumentation/Equipment	141
Communications/Interface	J2
Attentiveness	J3
Access Control/Control Room	J13
Professionalism	J4
Shift Manning/Staffing	A3
Plant Safety	Q
SRC Activities	Q1
PSRC Activities	Q2
Shutdown Risk	Q3
Station Blackout	Q4
Procurement Doc Control	4
Purchasing	41
Dedication of Material	42
Documentation Requirements/Specified	43
Vendor Surveillance/Surveys	44
QSL	45
Procurement Document Review	46
Accuracy and Completeness	461
Work Scope Statement/Description	462
Technical Requirements Specified	463
Quality Level Specified	465
Minimum Quality Requirements Specified	466
Inspection Requirements/Characteristics Specified	467
QSL Requirements Specified	468
Contracts	469
Contractor Control	J120
Supplier deviation (SDDR)	470
Quality	2
Requirements/Expectations	23
Attention to Detail/Quality Attained by Worker	24
Assessments/Audits/Monitoring/Trend	25
Self Verification/Checking	27
Pre-Job Briefing/Planning/Plant Personnel	J82
Work Steps Signed as Completed	211
Verbatim Compliance	212
Communication/Interface	J2
QA Records	17
Records Complete/Legible	171
Records Alterations	172
Record Storage	173
Records Retrieval	174
Records Inspections	175
Radiological Protection	R
Frisking of Personnel/Equipment	R1
Radiological Surveys Properly Performed	R2
Exposure/Contamination Controls	R3
RWP Activation/Adherence	R4
Access Control/HP	J11
RADCON Protective Clothing Utilization/Disposal	R6
ALARA	R7
Radioactive Laundry	R8
Radioactive Material Control	R9
Dosimetry	R10
HP Instrumentation Condition/Calibration	R11
Respiratory Protection	R12
Postings/Survey Maps	R13
Very High\High Rad Control	R14
Release of Material from RCA	R15
Special Nuclear Material\Fuel Handling	R16
Source Term	R17
Decontamination	R18
Pre-job Briefing/Planning/HP	J81
Radwaste	W
Radioactive Waste Shipping Papers	W1
Radioactive Waste Shipping Container	W2
Radioactive Waste Transport Vehicle	W3
Radioactive Waste Process Control	W4
Radioactive Waste Onsite Storage	W5
Safety	S
Hoisting, Rigging, Handling, and Crane Usage	S1
Lighting\Emergency Lighting	S2
Warning Devices/Signs/Posting	S3
Protective Equipment	S4
Scaffolding/Ladders	S5
Confined Spaces Surveyed and Posted/ Air Monitored	S6
Heat Stress	S7
Electrical Safety	S8
Laboratory Safety	S9
Compressed Gas Storage	S10
Safety Investigation/Inspection	S13
Event Reporting	S14
Safety Policies	S15
Worker Safety Practices/Use of Safety Gear	S16
Eye Wash Stations/Decon showers Maintained	S17

ACTIVITY CODES

Attachment C

Security	E
Post Manning	E1
Security Equipment	E2
Access Control Security	J12
Communications Interface	J2
Escort Duties	E5
Vehicle Control	E6
Drill Control	E7
Drill Critique	E8
Safeguards	E9
Fitness-for-Duty	E10
Special Processes	9
Procedure Qualification	92
Weld Control Inspections	93
Weld Control Program	94
Liquid Penetrant	95
Magnetic Particle	96
Ultrasonic Examination	97
Radiographic Examination	98
Eddy Current Examination	99
Leak Testing	910
Chemical Cleaning	911
Status Indication	14
Caution/OOS	141
Clearance /Protective Tagging	143
Scaffolding Tags	144
Work Incomplete Tags	145
Temporary Alterations Tags	146
Tech Spec Compliance	A
LCO Entered/Adherence	A1
Shift Manning/Staffing	A3
Overtime Usage	A4
Tech Spec Requirements	A5
Surveillance Activities	A6
TRM Compliance	A7
Test Control	11
Test Set Up	111
Test Results	112
Test Evaluation	113
Personnel Qualifications/Knowledge	T2
Test Requirements	115
LLRT / ILRT	116
Training	T
Training Performance	T1
Personnel Qualifications/Knowledge	T2
Instructor Performance	T3
Training Material Content	T4
Accreditation Reqs	T5
OJT/On the Job Training	T6
Training Examination	T7
Remedial Training	T8
TRG/Training Review Group	T9
Continuing Training	T10
Qual Cards	T11
Waivers Training	T12
Feedback Training	T13
Support of Training	T14
Trainee Control	T15
Certification	T16
Required Reading	T17

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 Pubs	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
Supports	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. Purc. 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.	OS
Licensed Operators	OL
Non-Licensed Operators	ON
Trainees	OT
Radwaste	OR
Shift Engineers	OE
Fire Protection	OF
(B) CHEMISTRY	CE
Environmental	CC
Plant Chemistry (Chem Supt)	CS
Chemistry Tech Support	
(C) RADIATION CONTROL	RD
HP Dosimetry	RCP
Program	RP
HP Plant (HP Supt)	RR
HP Radwaste	RA
HP ALARA	RI
RP & Inst.	OTS
(D) OUTAGE SCHEDULING	SA
(E) SAFETY ADMINISTRATION	
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	INI
NRC Inspection Report	INB
NRC Bulletins/Information Notice	INS
NRC SALP	INP
INPO	INN
Nuclear Network	IEP
EPRI	IPB
Publications	IVD
Vendor Identified	IMO
Word of Mouth	

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

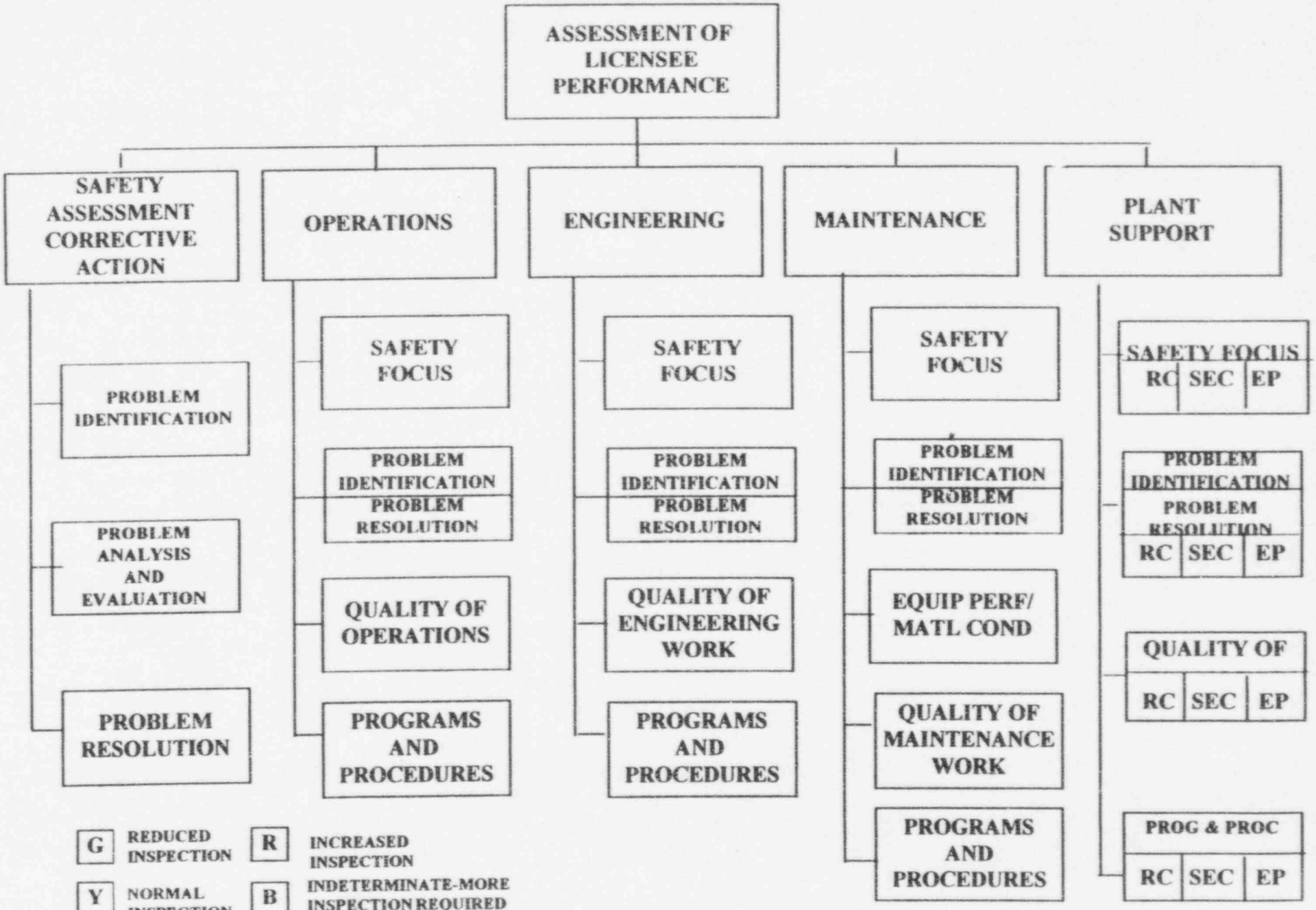
LOCATION CODES

LOCATION	CODES
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
Radwaste Building	RW
Standby Service Water	SSW
Steam Tunnel	ST
Turbine Building	TB
Warehouse	WH
Water Treatment Building	WB

TECHNICAL SPECIFICATION
REQUIRED AUDITS

SUBJECT	FREQ.
• 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

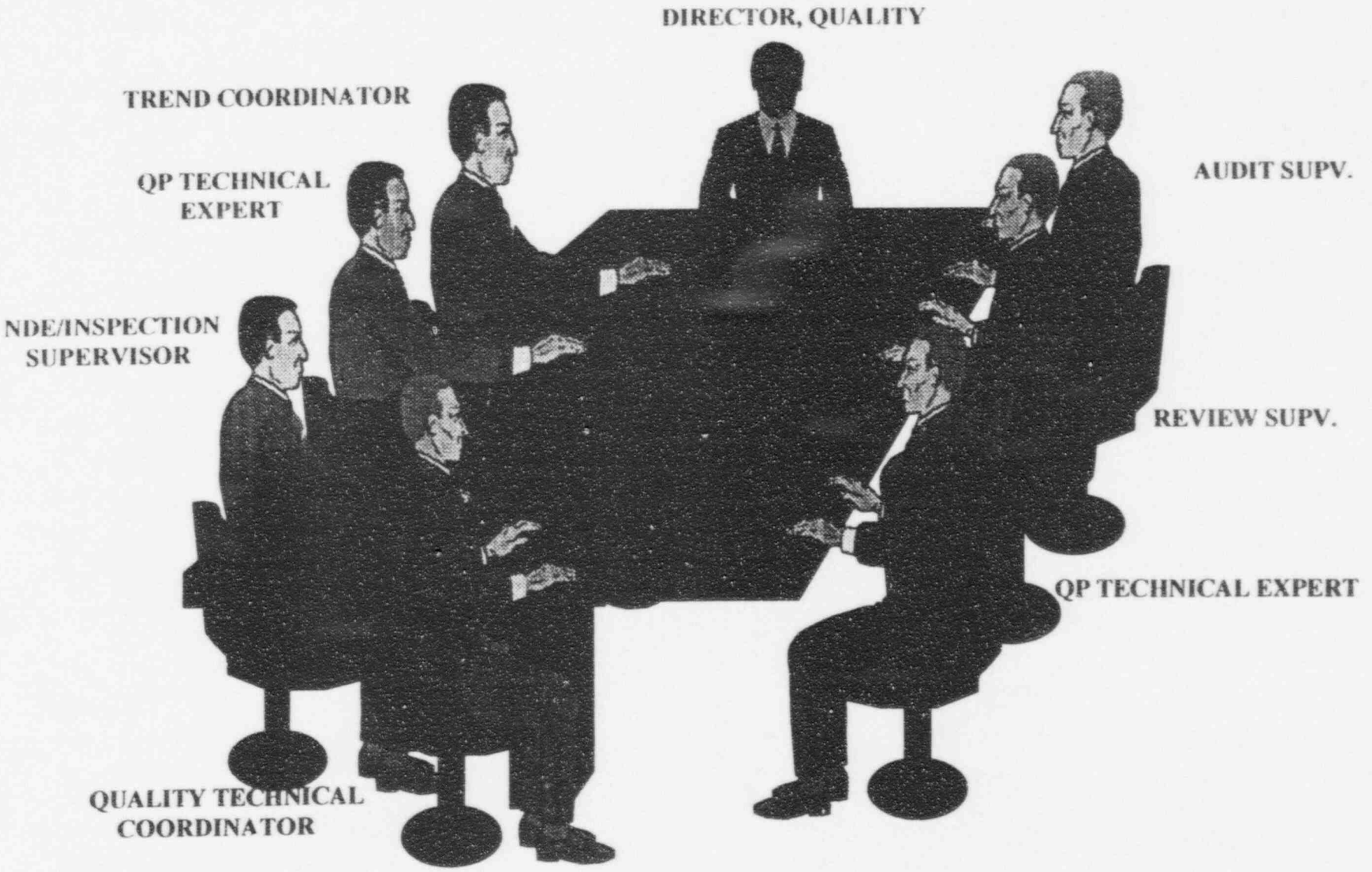
- CHEMISTRY/ENVIRONMENTAL
- COMPUTER SOFTWARE
- CORRECTIVE ACTION PROCESS
- DESIGN CONTROL
- DOCUMENT CONTROL
- EMERGENCY PREPAREDNESS
- FIRE PROTECTION
- GENERAL ACTIVITIES
- HANDLING STORAGE AND SHIPPING
- IDENTIFICATION AND CONTROL
- INSPECTION
- INSTRUCTIONS PROCEDURES AND DRAWINGS
- LICENSING ACTIVITIES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

CHEMISTRY/ ENVIRONMENTAL	REDUCED	NORMAL	INCREASED
ELEMENTS			
• 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		
• B2 - Offsite Dose Calculation	Reduce Oversight	38 data points anlayzed: 35 fully acceptable, 2 non-significant deficiencies (QDR)
• 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)
• 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

AUDIT TOPIC	REQUIREMENT	FREQUENCY
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

ENTERGY

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C. R. Hutchinson
Vice President
Operations
Grand Gulf Nuclear Station

November 6, 1995

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.

-95111302 15 10PP

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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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 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 CCNS 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.

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.

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.