LICENSEE: ENTERGY OPERATIONS, INC. September 10, 1998

FACILITIES: ARKANSAS NUCLEAR ONE, GRAND GULF, RIVER BEND, AND WATERFORD

SUBJECT: MEETING SUMMARY OF AUGUST 27, 1998, TO DISCUSS REVIEW STATUS OF THE STANDARD QUALITY ASSURANCE MANUAL

On August 27, 1998, the staff met with representatives from Entergy Operations, Inc. to discuss the status of review of the standard quality assurance (QA) manual for all the Entergy sites. The list of meeting attendees is attached as Attachment 1.

The meeting attendees discussed the status of review and specific review questions by using the Entergy QAPM Review Matrix in Attachment 2. A number of the questions were closed with acceptable responses by the licensee. The matrix will be updated to indicate those closed and with new questions as the staff's review continues. The revised matrix will be used at the next scheduled review meeting currently planned for September 29, 1998.

ORIGINAL SIGNED BY:
David L. Wigginton, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-313, 50-368, 50-416, 50-458, 50-382

Attachments: As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 10, 1998

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ENTERGY OPERATIONS, INC.

STANDARD QUALITY ASSURANCE PLAN

MEETING ON AUGUST 27, 1998

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D. Wigginton	NRR, DRPW
B. Ford	Entergy
C. Wells	Entergy
B. Killian	Entergy, W-3

ATTACHMENT 1

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-1	The statement in QAPM A.1.c that "The requirements of the QAPM are applied to these items and activities to an extent commensurate with their importance to safety" and similar statements in other referenced Standards could be misapplied and result in "shall" commitments inappropriately bypassed without the appropriate review process.	The statement in A.1.c is modified to clarify that it is the method of implementation of the requirements of the QAPM that changes depending on the safety signification of the item or acivity and not the requirements of the QAPM. A.1.c (B The **methods of implementation of the** requirements of the QAPM are commensurate with **the item's or activity's** importance to safety.		Yes
Q-2	Need to clarify the duties and reporting responsibilities of any line organization QA functional responsibilities. The specific concern was related to the QC type functions. Section B.12.a (p.15); it appears that line organization personnel perform inspections; not clear. If the line organization personnel perform the inspections, how is independence maintained between doers and verifiers? Does the QAPM meet A.2.b of SRP 17.3?	The proposed QAPM currently has the following requirements related to the duties and responsibilities of personnel performing the QC and the QA manager's relationship: **QC personnel** A.6.a It is the responsibility of each individual to promptly identify and report conditions adverse to quality. Management at all levels encourages the identification of conditions that are adverse to quality. B.12.a and N18.7 Section 5.2.17 The inspection program may be implemented by or for the organization performing the activity to be inspected. Inspections are performed by qualified personnel other than those who performed or directly supervised the work being inspected. B.12.d Inspection results are to be documented by the inspector and reviewed by qualified personnel. N18.7 Section 5.2.17 The owner organization shall evaluate inspection results B Records shall be kept in sufficient detail to permit adequate confirmation of the inspection program. B Deviation, their cause, and any corrective action completed or planned as a result of the deviations shall be documented. **QA Manager**		Yes

ATTACHMENT 2

Number	Comment	Response	Closed?	Submit?
		A.2.d.1 The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the quality assurance program as described in this QAPM. C.1.c Personnel performing audits have no direct responsibilities in the area they are assessing. N18.7 Section 4.5 Those performing audits may be members of the audited organization; however, they shall not audit activities for which they have immediate responsibility. While performing the audit, they shall not report to a management representative who has immediate responsibility for the activity being audited. **Conclusion** As evidenced by the guidance of ANSI N18.7, the regulatory intent of the functional relationship between the QC function and the QA management is to allow the QC function to be implemented by the line organization, the results documented, and the QA function (with independence) to audit the QC function performance. These sections of ANSI N18.7 were endorsed without exception in RG 1.33 R2. The proposed QAPM correctly reflects this intent without changes. An editorial change associated with respect to this item is to add a cross reference to RG 1.33 in QAPM B.12 **B.12.f Additional details concerning inspections may be found in the Regulatory Guides and associated Standards as committed to in Section A.7 and Table 1 (e.g., Regulatory Guide 1.33).**		
Q-3	Need to clarify the duties and reporting responsibilities of any line organization QA functional responsibilities. One method may be a	A licensee's organization description needs to contain sufficient detail to provide reasonable assurance of		

Number	Comment	Response	Closed?	Submit?
	functional chart. Additional NRC discussion: NRC requirements to demonstrate organizational acceptability: The licensee's organization chart needs to demonstrate the QA Manager's freedom from undue cost and schedule pressures in the performance of QA responsibilities by showing appropriate reporting lines of authority to upper levels of management. We are also interested in assuring that the QA Manager's ability to focus on QA matters is not excessively diluted by the addition of other non-related responsibilities. So the organizational chart should also show the full complement of other functional areas. The chart does not need to include specific titles, but should indicate general titles for each functional area; general descriptions of responsibilities for each title box can be delineated in the text. Of particular interest is an identification of what QA functions delineated in the QAPM are implemented by what organizational element. These are the general organizational factors that demonstrate conformance to Appendix B.	management oversight in the performance of quality assurance responsibilities. Consideration from undue cost and schedule pressures by the preparation, review, and submittal of unwarranted determinations regarding reductions is commitment for organizational restructure is essential in today's environment. This assurance and consideration is accomplished by showing only the appropriate reporting lines of authority to upper levels of management. This provides a licensee with the opportunity to focus on matters essential to safety, thereby providing for the safety of the general public, rather than on organizational make-up of plant personnel. Therefore, organization charts should not include specific titles, but rather general titles for each functional area, with general descriptions of responsibilities for each title box delineated in implementing procedures. Specific discussions The reporting line of authority is described in QAPM section A.2. This section shows the line of authority from the chief executive officer to the QA manager. This described line of authority insures that the QA manager has an organizational functional level with a high degree of authority by requiring that the QA manager either report directly to the associated VP or at most allows a single level of management between the VP and the QA manager. Having a level of management between the QA manager and the VP has been accepted by the NRC in the past. Additionally, QAPM A.2.d.1 states that the QA manager has the authority and responsibility to escalate matters directly to the chief executive officer when needed. ANSI Standard N18.7 Section 3.4 in the last paragraph provides the NRC accepted guidance concerning other duties of the QA manager position. This standard will continue to be meet under the new plan.		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-4	**Table 1 A.1 General Qualification requirements for personnel will meet ANSI/ANS 3.1 1978 except where exception to ANSI N18.1 or to this Standard is identified in the applicable unit's Technical Specifications.** RG 1.8 R1(1975) does not address ANSI/ANS 3.1 at all. RG 1.8 R2(1987) does endorse certain portions of 3.1 (1981). W3 has positions where 3.1 (1978) applies and others where 18.1 applies. GG uses section of the 3.1 (1979) draft plus some of 3.1 1978. More detail appears to be needed on what is covered under 3.1, what is still under 18.1, which version of 3.1 should be used, and how the incorporation of TMI Action Plan Requirements which were gradually being incorporated into later versions of 3.1 will be considered when an earlier version of 3.1 is used. Since 3.1 is being used, perhaps consideration could be given to the requirements of RG 1.8 R2 (1987) as the more appropriate commitment at this time. How will future changes to Tech Spec exceptions to these standards be controlled? 50.59? 50.54? Both?	RG 1.8 is being used as a place holder in the QAPM (this is very consistent with the RBS requirements Ref. RBS USAR Section 1.8 page 8). RG 1.8 R 1 indorses ANSI N18.1 1971 without any clarifications except for the Radiation Protection Manager. Requirements for the Radiation Protection Manager are in each of the units Technical Specifications and are not being changed by this proposed QAPM revision. Entergy is proposing to commit to meet ANS 3.1 1978 except for specific exceptions identified in the Technical Specifications. This is a significant increase in commitment for ANO and GGNS since ANS 3.1 1978 has many requirements not contained in ANSI 18.1 1971. Future changes to the TS will be controlled in accordance with 10 CFR 50.92 which requires prior NRC approval.		
Q-5	**Table 1 A.1 Individuals filling positions at the time of implementation of this commitment can be considered to meet the requirements of this commitment for that position without further review and documentation.** Include "fully qualified under existing commitments" in addition to "filling positions". Does any consideration need to be given here for recertifications or proficiency training requirement? Will these all be law new commitments without exceptions?	The main problem with the addition is that many positions did not have any qualifications in ANSI 18.1 1971. What about a change to: Individuals filling positions at the time of implementation of this commitment can be considered to meet **any more restrictive aspects of** the requirements of this commitment for that position without further review and documentation.		
Q-6	**Table 1 A.2. General The following qualifications may be considered equivalent to a bachelor's degree:** **a. 4 years of formal schooling in science or engineering,** **b. 4 years of applied experience at a nuclear facility in the area for which qualification is sought,** **c. 4 years of operational or technical experience/training in nuclear power, or** **d. any combination of the above totaling 4 years.** This is an existing exception from GG. See L20.	Section 4.1 of ANS 3.1 allows other factors to be used in place of degree requirements. It provides a list that may be considered. The clarification provides the specific list which will be applied. As identified in GGNS UFSAR Appendix 3A page 1.8-1 these requirements are considered equivalent to a bachelor's degree. This was added to the UFSAR in pre Operating License Amendment 28 dated 3/79. N18.1 1971 only identifies degree requirements for 2 positions as required.		

Number	Comment	Response	Closed?	Submit?
	1) Are all the units' Tech Specs consistent with this? If tech specs specify bachelor, is a bachelor degree required rather than this option? NRC current alternate qualification guidance for ISEG requires more experience to substitute for a bachelor's, as one example. How is this consistent? What about QA manager? 3) Do these requirements apply to more than just QA positions? NRC QA staff might have to get other groups involved if so. (licensing, rad protection, etc.), and 4) When was this exception incorporated? What was the justification?			
Q-7	**Table 1 B.3. ANSI N45.2.4 Documented routine inspections and audits of the storage area may Section 3 be performed instead of the requirements of this Section.** Requirements for initial receipt and storage are covered by another standard. Here only verification that items are in satisfactory condition for installation and have not suffered since initial receipt is being addressed. As such this is basically consistent with the current QAP approved by the NRC for ANO on page T1-10 of its discussion of compliance. *"...to assure that stored items are maintained in a satisfactory condition."* might be added to the end as this was included in ANO's discussion, however, this might also already be considered implied based on the context of this section of the standard. See L16.	It's implied by the section it is referencing.		
Q-8	**Table 1 B.4. ANSI N45.2.4 QAPM Section B.12 will be complied with instead of the Section 5.1 requirements of Section 5.1.1, Section 5.1.2, and the first sentence of Section 5.1.3.** The GG exception uses its Policy 10.0 "Inspection" to implement the above ANSI requirements. However, Policy 10 as written is more detailed than the new QAPM Section B.12 cited above. Moreover, since this was not an exception for the other sites, and since there are even more specific items in the standard than are contained in either the current GG exception or the new QAPM Section B.12, it seems appropriate to ask why the applicable portions of 5.1 should not be included in addition to B.12? This seems more appropriate than the "instead of" wording used above. This also seems to have been the intent of the cited GG exception, as it says "... The inspection program will incorporate, as applicable, those items listed in these subsections...." See L20.	**Will remove the clarification.**		YES

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-9	**Table 1 C. 1. Section C.1 Entergy will provide procedures for the guide's Appendix A activities as discussed. . .owever Entergy does not consider all activities listed to be safety-related" (e.g., activities in 7.e).** Did not see the discussion of this one.	W3 Att 6 page 43 item 6. Also, really just a statement of fact. 10 CFR 50.2 provides the definition of safety related. We consider whatever meets that definition to be safety related.		
Q-10	**Table 1 C. 3. ANSI N18.7 Section 1 Sentences 4 and 5 state, "However, applicable sections of this standard should be used as they apply to related activities. Activities included are: Design Changes, Purchasing, Fabricating..." With regard to radioactive material transportation activities, Entergy will only implement the requirements associated with those activities conducted in accordance with the applicable NRC Quality Assurance Program Approval for Radioactive Material Packages.** Entergy states this is consistent with the current QAP for GG. Actual GG exception to these sentences is worded "The licensee does not intend to fabricate, design, assemble, or modify any NRC licensed container to be used to transport radioactive material." Is there a difference here? App A p11 of 36. See L20.	T.ere is not really a difference. I was just trying to reference back to the actual controlling document which is the QAP Approval for Radioactive Material Packages. It provides restrictions on the activities Entergy can perform. Listing the items in multiple documents just adds to the chance that one gets changed without the other getting changed. A copy of ANO's QAP Approval for Radioactive Material Packages can be found on Attachment 3 page 174.		
Q-11	**Table 1 C. 4. ANSI N18.7 Section 4.3.1 The specific areas of experience described in this section is not applicable to the on-site safety review committee but the committee must be comprised of site operating or engineering supervisory personnel. Additionally, the off-site safety review committee need contain experience in only a majority of the areas.** Entergy states this is a combination of currently approved QAPs for W3 and GG. The first sentence is said to be based on W3 QAP Chapter 1 section 4.10.2 which states " The PORC shall be composed of site management members as assigned, in writing, by the GMPO. The GMPO will also indicate, in writing, the PORC Chairman." This does not appear to completely address the first sentence here with regard to experience. The second sentence actually appears to comes from GG UFSAR p16B.1-207, referenced in the QAP, which states "In the aggregate, the membership of the committee shall provide specific practical experience in the majority of the disciplines of 7.4.2.1a through h." See L19 and L20	The are 2 separate committees discussed in this section 1) the onsite safety review group and the offsite safety review group. On-site safety review committee ANO Att 3 page 44 item 1.3.9.2.2.1 (a.k.a. PSC) GGNS Att 4 page 85 item 7.4.1.2 (a.k.a. PSRC) RBS Att 5 page 20 item TR 5.8.1.2 (a.k.a. FRC) W3 Att 6 page 14 item 4.10.1 (a.k.a. PORC) The first sentence is taking exception to the experience list for the on-site safety review committee. The current requirements at the sites basically say that the committee is comprised of site management and do not invoke the N18.7 experience requirements. The wording is nearest the GGNS words. The documentation part is covered in the general requirement found in QAPM A.1.d. Off-site safety review committee		

Number	Comment	Response	Closed?	Submit?
		ANO Att 3 page 44 item 1.3.9.1.2.1 and 1.3.9.1.3.1 (a.k.a. SRC) GGNS Att 4 page 88 item 7.4.2.2.b (a.k.a. SRC) RBS Att 5 page 23 item TR 5.8.3.2 (a.k.a. NRB) W3 Att 6 page 13 item 4.9.2 & 4.9.3 (a.k.a. SRC) The second sentence is addressing the requirements for the off-site safety review committee. All of the plants have an experience list similar to the list in N18.7 but N18.7 items 7 and 10 are not on the current lists and RBS has 2 extra items (e.g., 8 and 10 items required). GGNS has the discussion that experience is only required for a majority of the items (i.e., 4 items required). The proposed clarification requires 5 of the 10 items. Additionally, the last paragraph in the first column for N18.7 S 4.3.1 says you will add experience when needed. The new item is slightly less restrictive for ANO, RBS, and W3 and slightly more restrictive for GGNS but any potential problems caused by the experience difference is covered by last paragraph in the first column for N18.7 S 4.3.1.		
Q-12	**Table 1 C. 6. ANSI N18.7 Section 4.3.4(2) Reviews associated with changes to the technical specifications will be performed in accordance with Section 4.3.4(3) instead of this section.** This appears to come from GG UFSAR 7.4.2.7.e and proposed clarification from RG 1.33 Section C.3. This seems to be used as basis but it is not clear why this should require an exception/clarification to 4.3.4(2). RG1.33 C.3 merely states "Section 4.3.4, "Subjects Requiring Independent Review," Item (3) states, in part, that changes to the technical specifications or license amendments related to nuclear safety are required to be reviewed by the independent review body prior to implementation. It should be noted that proposed changes to technical specifications or license amendments should be reviewed by the independent review body prior to their submittal to the Commission for approval." *What is the purpose of this item 6 clarification? Isn't commitment to the RG enough?* See L20.	The requirements of Section 4.3.4(2) could be interpreted to require that the committees review the procedures associated with the TS change in a way some how different than the review of the TS change. Also, I would have to clarify the TS review requirements twice if I leave this section applicable. Section 4.3.4(3) provides the needed guidance; therefore, exception to Section 4.3.4(2) was taken for clarity.		
Q-13	**Table 1 C. 7. ANSI N18.7 Section 4.3.4(3) This requirement is implemented by reviewing the no significant hazards considerations evaluation for the proposed change prior to submittal to the Commission for approval.**	Letters which transmit a proposed technical specification or license change to the Commission have many parts (e.g., cover letter and background). The section that provides the safety justification is the no significant hazards considerations evaluation for the		

Number	Comment	Response	Closed?	Submit?
	This is a new change for all the facilities. It appears to be intended to focus the attention of the independent review on the above part of the submittal. Guidance to focus the review here may be appropriate but it should not necessarily be limited to this part of the submittal. RG 1.33 C.3 clarification information was also included for completeness. See A13.	proposed change. This is the section of the proposed change where the safety committees need to focus their reviews. This change is made to clarify that revisions to a previously submitted proposed change only requires review by the safety committees when the safety justification for the requested change has been modified by the revision. Having the safety review committees review the no significant hazards consideration is consistent with the way 10 CFR 50.59 evaluations are handled. The committees review as a minimum the evaluation but not necessary all of the other documents associated with a change (e.g., the markups of the SAR).		
Q-14	**Table 1 C. 8. ANSI N18.7 Section 4.3.4(4) In place of the requirements of this section the on-site and off-site safety review committees shall review facility operations to detect potential nuclear safety hazards and all reports made in accordance with 10 CFR 50.73.** 4.3.4(4) deals with review of various violations, deviations and reportable events, which require reporting to the NRC in writing within 24 hours. This clarification is said to be based on W3 QAP Chapter 1 Section 4.10.5. However 4.10.5 has more specific examples than described above. Moreover, neither W3 or any of the other plants specifically took exception to 4.3.4(4) before. It is unclear why this is needed or desired. Does 50.73 alone cover everything under 4.3.4(4)? See L19 and L4.	From what I understand, a long time ago there were 24 hour written reports as described in this section. These were deleted and 10 CFR 50.72 (one hour and 4 hours calls) and 10 CFR 50.73 (30 day reports) replaced them. I have never seen a 24 hour written report. All of the plants have a list of items to review with the consistent theme being REPORTABLE EVENTS (i.e., 10 CFR 50.73). The other requirements varied from plant to plant and the intent seemed to be to detect potential nuclear safety hazards. We have tried to identify the acceptance criteria for the review and move some of the details to procedures. Also, GGNS (Att. 4 page 92 item 11) took exception to this entire section and replaced it with the inserted UFSAR pages.		
Q-15	**Table 1 C. 9. ANSI N18.7 Section 4.3.4(5) Included in the matters reviewed by the on-site safety review committee in accordance with this section are the following:** **a. new and revised station administrative procedures and** **b. changes to the Emergency Plan (except editorial changes).** 4.3.4(5) deals with other matters involving safe operation of the nuclear plant which an independent reviewer might consider appropriate for consideration. This clarification is said to be based on W3 QAP Chapter 1 Section 4.10.5. These are items included under	This statement does not reduce the review requirements of Section 4.3.4(5) it only adds requirements. I tried to convey this with the words "Included in the matters reviewed B" and not words like "in place of". We will change the words to the following: **Examples of the** matters reviewed by the on-site safety review committee in accordance with this section are the following: B		YES

Number	Comment	Response	Closed?	Submit?
	4.10.5 for W3. However, neither W3 or any of the other plants specifically took exception to 4.3.4(5) before. Therefore, so long as the above statement is taken as an example and not an exclusive set, this could be acceptable. Perhaps wording like "...such as the following:" instead of "...are the following." See L19.			
Q-16	**Table 1 C.11. ANSI N18.7 Section 4.5 The independent review body discussed in this section is the off-site safety review committee.** Section 4.5 includes a requirement for a periodic review of the audit program be performed by the independent review body or by a management representative at least semiannually.... This clarification is based on W3 QAP Chapter 1 Section 4.9.10.3 and Chapter 18 Section 5.2. These Sections do indicate that audit activities are performed under the cognizance of the SRC, although specific periodic review requirements are not addressed. However, as far as the above clarification, there would not seem to be any reason within 18.7 or RG 1.33 which would conflict with the above clarification. See L19.	All of the sites required that the offsite review committee oversee audits (ref. GGNS Att 4 page 89 item 7.4.2.8). The only potential conflict is that the on-site safety review committee is also an independent review body and that is not the body that should perform this review.		
Q-17	**Table 1 C.12. ANSI N18.7 Section 5.1 Instead of the requirements of this section to have a summary document, a method of cross referencing these requirements to the implementing procedures will be maintained.** *Consistent with the QAP approved by the NRC for RB? Where is this in the RB QAP?* See L21.	This sentence was referring to the fact that RBS does not have a QA program implementing procedure list with associated responsible department in their QA manual.		
Q-18	**Table 1 C. 13. ANSI N18.7 Section 5.2.2 The person who holds a senior reactor operators license for the affected unit and approves a temporary change to a procedure is not required to be in charge of the shift.** The basis for this GG UFSAR page 1GB.1-208 & 209. Here when describing temporary approval and the two members of the plant management staff, it only adds that "...at least one of whom holds a Senior Reactor Operator's License." However, this does not specifically take exception to 5.2.2 which may be viewed as an additional requirement on this operator? Is there anywhere else, such as in the UFSAR exceptions to RGs or other NRC approvals/positions, which specifically exempts the requirement as is done above? See L20.	GGNS Att 4 page 92 item 14 takes exception to all of the temp. change requirements in N18.7 Section 5.2.2 and says GGNS will follow the TS and UFSAR. UFSAR pages 208 and 209 are the requirements (they previously were the TS requirements). Since GGNS took exception to the all of the temp. change requirements they did not address the N18.7 Section 5.2.2. words of "supervisor in charge of the shift." GGNS only specified the person hold an SRO. Since I'm no longer taking exception to the all of the temp. change requirements, I needed to address the words in N18.7 Section 5.2.2. Taking exception to the words "supervisor in charge of the shift" is consistent with the current GGNS requirements. The revised requirements provides sufficient controls to insure knowledgeable operations involvement while allowing for the workload on shift personnel to be controlled.		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-19	**Table 1 C. 14. ANSI N18.7 Section 5.2.2 In addition to the temporary procedure change process described for changes which clearly do not change the intent of a procedure, temporary procedure changes which may change the intent of a procedure may be made following the process described in this section. Except that the person normally responsible for approving revisions to the procedure is the approval authority for the change.** The basis for this GG UFSAR page 16B.1-208 & 209. Here there is an additional option not covered in 5.2.2 for temporary changes, i.e. those which may involve a change in intent. As this was previously accepted GG by the NRC, and as the person approving is the person normally responsible for approving the revision, and provided other normal requirements for procedure review are met, this appears to be acceptable. Is additional comment on review requirements for this special case needed here? See L20.	This requirement adds an extra layer of conservatism to the change process for changes potentially involving intent changes. Like the temporary procedure changes which clearly do not change the intent, these temporary procedure changes must have the remaining reviews performed prior to becoming permanent.		
Q-20	**C.15. ANSI N18.7 Section 5.2.6 Instead of the requirements of this section, non-conforming conditions will be evaluated and controlled in accordance with the corrective action program.** Section 5.2.6 deals with equipment control in general and goes beyond just control of nonconforming conditions. A justification for not using these equipment controls in addition to those which may be required by the corrective action program has not been provided. What is the purpose of this clarification/exception? See L.4.	The wording of the clarification is to broad. The intent was that the discussion concerning the control of nonconforming conditions be taken exception to by this clarification. Revise the clarification to the following: "Instead of the requirements of this section **concerning non-conforming conditions**, non-conforming conditions will be evaluated and controlled in accordance with the corrective action program." This section in the ANSI Standard talks about declaring systems inoperable. Each plant has a program to meet Generic Letter 91-18 to control the decision process for determining if equipment is inoperable. If was considered preferable to leave all of the details in the GL 91-18 program.		YES
Q-21	**Table 1 C.16. ANSI N18.7 Section 5.2.6 The requirement of the fifth paragraph of this section to have a log of the status of temporary modifications is not applicable to temporary modifications installed in accordance with procedures which provide assurance that approvals are obtained, temporary modification activities are verified, and that activities are adequately documented to indicate the status of the temporary modification.**	The requirement that the activity be in accordance with an approved procedure was considered to be a sufficient description of the types of tasks. The wording of the exemption is modified to insure that the intent of item (2) is maintained. The words are not modified to match the words of item (3) since to proposed words more accurately reflect the requirement as discussed in N18.7. N18.7 required "[a] log shall be maintained of		YES

Number	Comment	Response	Closed?	Submit?
	This is basically consistent with the current QAP approved by the NRC for ANO (ANO QAP Section 14.2.5). However, the ANO wording seems somewhat more restrictive. i.e. "Additionally, temporary modifications which constitute temporary changes to plant configuration due to **routine tasks such as the additions of temporary jumpers or gauges as part of maintenance, calibration, or troubleshooting**, may be installed and removed by use of approved procedures or work plans, providing (2) and (3) above are satisfied. These changes are not maintained on a status log since removal of the temporary change is controlled by the same procedure or work plan which installed it." (2) above refers to "Perform independent verification of temporary modifications by an individual cognizant of the purpose and the effect of the temporary modification." (3) above refers to "Document temporary modifications to assure the actions are taken to return the equipment or system to its original operating configuration and status." See L.4 and L.16.	the current status of such temporary modifications." The proposed words require the activities be "adequately documented to indicate the status of the temporary modification." Modify the exception to state: The requirement of the fifth paragraph of this section to have a log of the status of temporary modifications is not applicable to temporary modifications installed in accordance with procedures. **These procedures shall** provide assurance that approvals are obtained, temporary modification activities are **independently verified by an individual cognizant of the purpose and the effect of the temporary modification**, and that activities are adequately documented to indicate the status of the temporary modification.		
Q-22	**Table 1 C.17. ANSI N18.7 Section 5.2.7.1 This section will be implemented by adding the words "Where practical" in front of the first and fourth sentences of the fifth paragraph. For modifications where the requirements of the fourth sentence are not considered practical, a review in accordance with the provisions of 10 CFR 50.59 will be conducted.** This is consistent with current QAP approved by NRC for GG in items (4) and (17) under exceptions to RG 1.33. However, (4) also specifically requires the 50.59 review also be ***documented***. See L20.	QAPM A.1.d provides the documentation requirement.		
Q-23	**Table 1 C.22. ANSI N18.7 Section 5.2.15 Required procedure reviews following the occurrences discussed in Section 5.2.15, paragraph 3, sentence 3, are determined and controlled in accordance with the QAPM Section A.6 instead of this section.** This is based on an current QAP approved by NRC for GG in item (22) under exceptions to RG 1.33. However, the reference to A.6 above does not seem appropriate to directly address this Section. Wording in current GG QAP that applies is: "Applicable procedures shall be reviewed following an accident, unexpected transient, significant operator error, or equipment malfunction which results in a reportable occurrence. The difference between this and 18.7 being the added..."which results in a reportable occurrence." Why not just say that here? See L.20 and L.4.	10 CFR 50.73(b) requires the identification and correction of procedures deficiencies which contribute to REPORTABLE EVENTS. QAPM A.6 requires that the root cause of significant events be investigated and corrective actions taken. Basically, exception was taken from this ANSI Section to reduce the number of places that similar requirements are discussed using different words. The proposed requirements meet the intent of the ANSI Standard while reducing the potential for confusion caused by different words being used.		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-24	**Table 1 C.24. ANSI N18.7 Section 5.2.16 Sentence 2 of paragraph 3 states: "Records shall be made and equipment suitably marked to indicate calibration status." Instead of requiring the marking of all equipment this statement is changed to require the equipment to be controlled to indicate the calibration status.** This is basically consistent with the intent of the current QAP clarification approved by the NRC for RB for ANSI N.45.2.4 section 2.5.2. In a recent SER for Farley the NRC found alternatives to marking calibration status on equipment to be acceptable based on: (1) unique instrument numbers are readable at the instrument, (2) the instrument numbers are traceable to calibration schedules and records, (3) the calibration schedules and records contain the same information as required by ANSI N45.2.4(1972), (4) these schedules and records are readily accessible to personnel who are required to check calibration status as required by governing procedures, (5) and the above alternative to tagging or labeling instruments with calibration data is "otherwise controlled" by its description in the requested change to the Quality Assurance Program Description. Do the "controls" as used here by Entergy cover these general criteria? Is more detail needed here, or is detail in controlling procedures sufficient? Perhaps something like "...controlled to indicate the calibration status to the same level of information as required by N45.2.4 and N18.7, with equivalent clarity, and with ready accessibility to those requiring information on calibration status of equipment." See L.8.	The additional words don't add to the clarity of the requirement. The clarification proposed provides an adequate description of the QA requirements. In addition to the current RBS clarification, GGNS has a clarification allowing the use of a computerized system (GGNS Att 4 page 96 item 30)		
Q-25	**Table 1 D.1. General Instead of using the cleanliness level classification system of ANSI N45.2.1, the required cleanliness for specific items and activities is addressed on a case-by-case basis. Cleanliness is maintained, consistent with the work being performed to prevent introduction of foreign material. As a minimum, cleanliness inspections are performed prior to system closure and such inspections are documented.** This is described as being consistent with the current QAP for RB. We don't have a specific table of exceptions for RB. Were is this exception described? See L.10.	RBS USAR Section 1.8 page 46 Item 2 at the bottom of the page.		
Q-26	**Table 1 D.3. Section C.4 Contamination levels in expendable products are based upon safe practices and industrial availability. Contaminant levels are controlled such that subsequent removal by standard cleaning methods results in the achievement of final acceptable levels which are not detrimental to the materials.**	Clarification proposed is consistent with a RBS clarification. Reference RBS USAR Section 1.8 page 46, Paragraph C.4 clarification, last half of the paragraph.		

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	C4. States: "Section 5 of ANSI N45.2.1-1973 states. in part, that low sulfur, low fluorine, and/or low chlorine compounds may be used on austenitic stainless steels and that low sulfur and low lead compounds may be used on nickel-base alloys. Chemical compounds that could contribute to intergranular cracking or stress-corrosion cracking should not be used with austenitic stainless steel and nickel-base alloys. Examples of such chemical compounds are those containing chlorides, fluorides, lead, zinc, copper, sulfur, or mercury where such elements are leachable or where they could be released by breakdown of the compounds under expected environmental conditions (e.g., by radiation). This limitation is not intended to prohibit the use of trichlorotrifluoroethane which meets the requirements of Military Specification Mil-C-81302b for cleaning or degreasing of austenitic stainless steel provided the precautions of subdivision 7.3(4) of ANSI N45.2.1-1973 are observed." The GG clarification cited states in part: "Expendable materials ... which contact stainless steel or nickel alloy surfaces shall not contain lead, zinc, copper, mercury, cadmium and other low melting point metals, their alloys or compounds, as basic and essential chemical constituents. Prescribed maximum levels of water leachable chlorides, total halogens, and sulphur and its compounds shall be imposed on expendable products." It is unclear if the newly worded exception is consistent with either of these statements. The "industrial availability" basis does not address the safety issue. The cleaning option to maintain acceptable levels, although a good practice, is not addressed as a basis in either C4 or the referenced GG clarification. This issue may need to be forwarded to the materials group for a technical determination. See L.20.			
Q-27	**Table 1 E.5. ANSI N45.2.2 Section 4.3. Inspections of packages and/or preservative coatings are made immediately prior to loading rather than after loading.** The new clarification is said to meet the intent of the original Regulatory Guide or ANSI requirement and is consistent with a discussion in the GG UFSAR. Where exactly is this GG discussion located? Is the concern that some areas may not be accessible for inspection after they are loaded? Perhaps "during loading" (i.e. each item is inspected as it is loaded) may be closer to the intent. See L.17.	This clarification is based on a clarification to in the RBS USAR. Reference USAR Section 1.8, page 48, item 3. The supplier verifies that the packaging is OK when it is given to the shipper (Section 4.3) and the warehouse verifies that it is OK when it is received (Section 5.2.2). You can not necessary inspect it while it is loaded.		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-28	**Table 1 E.21. ANSI N45.2.2 Section A.3.6.2 The last sentence is considered unnecessary guidance and not an Appendix (A-3) appropriate requirement since vapor barrier materials are usually brown, cream, or black in color.** The last sentence states "The barrier material should be brightly colored to preclude loss within a system." The above statement does not necessarily seem to be consistent with this. Alternate wording such as "... appropriately colored to prevent loss..." might be acceptable. Justification given for this change is that the new clarification meets the intent of the original Regulatory Guide. However, C.1.e of the RG states "...In lieu of this guideline, the vapor barrier material should be colored to contrast with the materials on which they are used." Therefore, why should any exception or clarification to the RG be needed at all? See L17.	RG 1.38 does address this issue and the words seem more appropriate. This clarification can be deleted. Delete E.21 and renumber remaining clarifications.		YES
Q-29	**Table 1 E.22. ANSI N45.2.2 Section A.3.7.1 In lieu of A3.7.1(3) and (4), Entergy will comply with the following: Appendix (A-3) Fiberboard boxes shall be securely closed either with a water resistant adhesive applied to the entire area of contact between the flaps, or all seams and joints shall be sealed with not less than 2-inch wide, water resistant tape.** Stated reason for this clarification is that it meets the intent of the original RG or ANSI requirement and is consistent with a discussion in the GG UFSAR. What specific references are used to arrive at this conclusion? The standard indicates that both adhesive and the tape are necessary for item 3 and item 4 indicates that strapping with reinforced tape is also necessary.	This clarification is consistent with a clarification to in the RBS USAR. Reference USAR Section 1.8, page 49, item 6. The intent of the ANSI seem to be that the box be well sealed. Either on of these methods seem sufficient to meet that intent.		
Q-30	**Table 1 E.26.ANSI N45.2.2 The last paragraph of A.3.9 could be interpreted as prohibiting any Appendix (A-3) direct marking on bare austenitic stainless steel and nickel alloy Section A.3.9 metal surfaces. As a alternate, paragraphs A.3.9. (1) and (2) may be used to control marking on the surface of austenitic stainless steels and nickel base alloys as long as contamination levels in the material used for marking are controlled such that the marking is not detrimental to the materials marked.** This is basically consistent with a clarification for RG1.38 on page T1-7 & 8 in the QAP approved by the NRC for ANO. However, the following specific conditions were included in the ANO exception: "Marking materials containing sulfur, lead, zinc, mercury, copper, and	The proposed item removed some of the specific details, but engineering evaluations control the materials used.		

Number	Comment	Response	Closed?	Submit?
	low melting point alloys as basic chemical constituent shall not be brought in contact, or shall not be used on surfaces of corrosion resistant alloys. Low-sulphur, low fluorine and/or low chlorine compounds may be used on austenitic stainless steels. the maximum limits for the above mentioned marking materials will be as follows: (a) total inorganic and organic halogen content shall not exceed one (1) percent. (b) The sulphur content shall not exceed one (1) percent. What specific additional requirements are committed to in order to ensure that these limitations are observed, and where are they located? See L.16and L.4.			
Q-31	**Table 1 F.1. ANSI N45.2.3 General The ANSI five level zone designation system may not be utilized, but the intent of the standard will be met for the areas of housekeeping, plant and personnel safety, and fire protection.** This is generally consistent with a clarification for RG1.39 item 7 on page 42 in the QAP approved by the NRC for W3. However, to avoid future confusion and to be completely consistent, the statement should be prefaced or followed by "...in the operations phase..." Also include a statement to the effect that procedure or instructions for housekeeping to include the applicable requirements of this standard will be developed on a case by case basis, as was included in the W3 case. See L.19.	The statement "in the operations phase" was removed and is not needed since all of our units have completed the construction phase. The original QA manuals were developed during the construction phase. That the designations are controlled by procedures is required by QAPM A.1.d. QAPM A.3.f says that procedures are to reflect the QAPM requirements. The term "case by case basis" really didn't add any thing to the exception. The requirement is that we procedurally ensure that the intent of the standard is met for all applicable plant areas.		
Q-32	**Table 1 F.2. ANSI N45.2.3 This section is not applicable. Section 3.1** This is basically consistent with an exception for RG1.39, item 2, 7th paragraph in the QAP approved by the NRC for GG. However, to avoid future confusion and to be completely consistent, the statement should be prefaced or followed by "...in the operations phase..." See L.20.	The statement "in the operations phase" was removed and is not needed since all of our units have completed the construction phase. The original QA manuals were developed during the construction phase.		
Q-33	**Table 1 F.5. ANSI N45.2.3 Section 3.4 This section is not applicable.** This is basically consistent with an exception for RG1.39, item 2, 12th paragraph in the QAP approved by the NRC for GG. However, to avoid future confusion and to be completely consistent, the statement should be prefaced or followed by with "...in the operations phase..." See L.20.	The statement "in the operations phase" was removed and is not needed since all of our units have completed the construction phase. The original QA manuals were developed during the construction phase.		
Q-34	**Table G.2. ANSI N45.2.6 Section 1.2 Paragraph 4 requires that the standard be imposed on personnel other than licensee employees; the applicability of this standard to suppliers will be**	The first sentence of the last paragraph says that it applies to "personnel of the owners". The proposed clarification doesn't affect that requirement.		

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	documented and applied, as appropriate, in procurement documents for such suppliers. This is consistent with an exception for RG1.58, item 2 in the QAP approved by the NRC for GG. See L.20. However, perhaps the wording could be revised to specifically indicate that this standard remains applicable for licensee employees.			
Q-35	**Table G.3. ANSI N45.2.6 Section 1.2 The requirements of this standard do not apply to personnel using editions of ASNT contained within 10 CFR 50.55a approved ASME editions or addenda later than those listed in the standard.** This is basically consistent with an exception for RG1.58, item 6 in the QAP approved by the NRC for GG. However, for the above to be correct, it should be clear that the standard is "not intended to apply to personnel who only perform inspection, examination, or testing in accordance with ASNT...SNT-TC-1A." This is already stated in the standard. It seems the real question might be the edition of ASNT. Perhaps the original GG exception wording is better (i.e. The licensee reserves the right to use later editions of ASNT contained within 10CFR50.55a approved ASME editions or addenda.) See L.20	I don't think there is any difference in the meanings but we'll change the words to: The requirements of this standard do not apply to personnel using **later editions of ASNT contained within 10CFR50.55a approved ASME editions or addenda.**		YES
Q-36	**Table G.5. ANSI N45.2.6 Section 3.5 Entergy reserves the right to use personnel who do not meet these experience requirements but have shown capability through training and testing or capability demonstration.** This is consistent with an exception for RG1.58, item 5 in the QAP approved by the NRC for GG. See L.20. What are the alternate training/testing/capability requirements for these levels? Were are the specified?	The alternate requirements will be as determined appropriate by the individual authority responsible for certification of these individuals. They could be different depending on the certification being sought. In accordance with QAPM A.1.d procedures will specify the requirements.		
Q-37	**Table 1 J.1.RG 1.88 Section 4.4 Entergy will meet the requirements of ANSI/ AS ME NQA-1-1983, Section C Supplement 17S-1 in lieu of N45.2.9 Section 5.6 or the discussions in this section for Records Storage Facilities with the clarification that penetrations providing fire protection, lighting, temperature/humidity control, or communications are acceptable.** Where is the ANO exception on which the paragraph is said to be based, and the RB exception on which the second paragraph is said to based?	The NQA-1 piece is on ANO Att 3 page 167. The penetrations piece, as indicated on the ANO markup, is based on GGNS Att 4 page 115.		
Q-38	**Table 1 J.5. ANSI N45.2.9 Section 5.4.3 Instead of the requirements of this section, Entergy will comply with the**	OK		YES

Number	Comment	Response	Closed?	Submit?
	following: Provisions shall be made for special processed records such as radiographs, photographs, negatives, microfilm, and magnetic media to prevent damage from excessive light, stacking, electromagnetic fields, temperature, and humidity as appropriate to the record type. This is consistent with an exception for RG1.88, item 4 in the QAP approved by the NRC for GG. However, it would seem appropriate to include "...with appropriate consideration of packaging and storing recommendations as provided by the manufacturer of these materials." This would help ensure that the requirement from the original standard is at least considered when appropriate. See L.20	Change this exemption to say: Instead of the requirements of this section, Entergy will comply with the following: Provisions shall be made for special processed records such as radiographs, photographs, negatives, microfilm, and magnetic media to prevent damage from excessive light, stacking, electromagnetic fields, temperature, and humidity as appropriate to the record type **with appropriate consideration of packaging and storing recommendations as provided by the manufacturer of these materials**.		
Q-39	**Table 1 J.7. ANSI N45.2.9 Section 5.6 Entergy will meet the requirements of ANSI/ASME NQA-1-1983, Supplement 17S-1 Section 4.4 in lieu of this section for Records Storage Facilities with the clarification that penetrations providing fire protection, lighting, temperature/humidity control, or communications are acceptable. Except that as an alternate to these requirements non-permanent records (e.g., 3 years retention records) may be stored and maintained by the originating organization in one-hour minimum fire rated file cabinets located in environmentally controlled facilities that have suitable fire protection. Suitable fire protection is provided by either an automatic sprinkler system or a combination of two or more of the following: 1) automatic fire alarms 2) hose stations, or 3) portable extinguishers.** The discussion of penetrations in the first paragraph is consistent with an exception for RG1.88, item 6 in the QAP approved by the NRC for GG. However, that exception also states that "All such penetrations shall be sealed or dampered to comply with a minimum two-hour fire protection rating." How is this addressed and where is the reference to NQA-1 made? See L.20 and L.16. RB is cited as the source for the second paragraph. How was this arrived at? See L.18.	The NQA-1 piece is on ANO Att 3 page 167. The penetrations piece, as indicated on the ANO markup, is based on GGNS Att 4 page 115. The second paragraph based on RBS USAR Section 1.8 page 135 item c.		
Q-40	**Table 1 K.6. ANSI N45.2.5 Section 5.5 Entergy will comply with inspection requirements of the applicable welding codes and any exceptions instead of this section.** This is basically consistent with an exception for RG1.94, item 7 in the QAP approved by the NRC for GG. See L20. However, the GG	NRC will know and approve welding code changes through the 10 CFR 50.55(a)(f) process. This is the method for later codes to be approved and their use authorized for Nuclear Facilities to use. EOI through the 10 CFR 50.55 required updates of 10 Year ISI Program will show which codes to use including original		

Number	Comment	Response	Closed?	Submit?
	exception states the applicable welding codes are specified in the UFSAR. What is the control here to ensure that the NRC knows and approves of the codes being applied?	construction codes, where applicable.		
Q-41	**Table 1 L.1. ANSI N45.2.8 Section 3 Documented routine inspections and audits of the storage area may be performed instead of the requirements of this section.** This said to be based on an exception in the QAP approved by the NRC for ANO. However, the approved exception for ANO on page T1-9 does not seem to explain this. Where are the appropriate references and how was the above exception arrived at? See L16.	The first full sentence on ANO Att 3 page 151 (T1-10) is this statement. The clarification begins on page 149 (T1-9). The rest of the clarification is stating the basis or affect of the clarification and is not necessary in the QAPM.		
Q-42	**Table 1 M.2. ANSI N45.2.13 Section 1.2.2 Item c is an option which may be used to assure quality; however, any option given in 10 CFR 50 Appendix B, Criterion VII as implemented by the QAPM may also be used.** This wording is basically consistent with an exception for RG1.123, item 2 in the QAP approved by the NRC for GG. However, GG's existing policies 4 and 7 on procurement document control and control of purchased material, equipment and services which are cited in the GG exception to this RG contain information specifically on evaluation of the supplier's quality assurance program that does not seem to be directly addressed in the new QAPM. For example, GG 7.5.7 specifically requires evaluations of the Supplier's Quality Assurance program (although this item was proposed for removal (see L.4)). What items in the new QAPM are specifically address S1.2.2.c requirement for an evaluation of the supplier's QA program and/or the Criteria VII requirements for the applicant assessment of the effectiveness of the control of quality by contractors? Is evaluation of the supplier's QA program specifically addressed or an alternative specifically described anywhere in this QAPM? The apparent removal of the specific requirement for evaluation of supplier's QA programs does not seem to meet the intent of the standard or App B. Criteria VII. The only issue really seems to be the method of evaluating the QA program and not whether it should be evaluated. Therefore, is it necessary to take exception at all? If so perhaps a statement such as "Details of the methods used to evaluate the supplier's quality assurance program as required by this section are implemented by the QAPM and associated procedures." See L20.	GG 7.5.7 is covered by the clarification to RG 1.144 Section C.3.b.(2) identified in Table 1 item N.3. This item and the associated RG requirements address the evaluation of the supplier's QA program. The part proposed for removal is the list of experience sources. This clarification is being modified as discussed in Question 46 below. Nothing significant was removed from the QA manual discussion of GGNS Policies 4 and 7 in the conversion to the new QAPM. Items from the ANSI Standards just were not repeated.		
Q-43	**Table 1 M 6. ANSI N45.2. 13 The requirements of the QAPM will be implemented instead of Section 3.4 this section.**	NRC place holder		

Number	Comment	Response	Closed?	Submit?
	This is basically consistent with an exception for RG1.123, item 4 in the QAP approved by the NRC for GG. It should be acceptable here provided that the Entergy QAPM sections on procurement document control and control of purchased material, equipment, and service are found acceptable with respect to GGNS's existing policies 4 and 7 which are cited in the GG exception to this RG. See L20.			
Q-44	**Table 1 M 8. ANSI N45.2.13 Section 8.2 Item b Non-conformances are only required to be submitted to Entergy when the non-conformance could adversely affect the end use of an item relative to safety, interchangeability, operability, reliability, integrity or maintainability.** This is basically consistent with an exception for RG1.123, item 3 in the QAP approved by the NRC for GG. The GG exception also lists the 4 non-conformances contained in the standard that the above statement applies to. Perhaps wording such as "Non-conformances conditions described in this section are only..." would remove any doubt. See L20.	OK Change the wording to the following: **Non-conformance notices** for **conditions described in this section** are only required to be submitted to Entergy when the non-conformance could adversely affect the end use of an item relative to safety, interchangeability, operability, reliability, integrity or maintainability.		YES
Q-45	**Table 1 N.1. RG 1.144 Section C.3.a.(2) This section is not applicable.** This is consistent with an exception for RG1.144 item 13 in the QAP approved by the NRC for GG. Section C.3.a.(2) is for Design and Construction Phase Activities. Perhaps add "...in the Operations	The original QA manuals were developed during the construction phase. Statements like "in the operations phase" were removed and are not needed since all of our units have completed the construction phase.		
Q-46	**Table 1 N.3. RG 1.144 Section C.3.b.(2) Instead of the annual documented evaluation of suppliers discussed in this section, a review of the supplier's performance is conducted in accordance with procedures.** This said to be consistent with an exception for RG1.144, item 14, paragraph 3 in the QAP approved by the NRC for GG. This paragraph actual says "A documented ongoing evaluation of the supplier should be performed." It also states, where applicable, this review should take into account the same items listed in this section and paragraph of the RG. Consider wording such as "...documented ongoing evaluation of supplier performance is conducted in accordance with procedures which take into account, where applicable, the other considerations of this section and paragraph of the RG." See L20.	OK. But the procedures and documented part is covered by QAPM A.1.d. Modify the clarification to state: Instead of the annual documented evaluation of suppliers discussed in this section, **an ongoing evaluation of supplier performance is conducted which takes into account, where applicable, the other considerations of this section and paragraph of the Regulatory Guide.**		YES
Q-47	**Table 1 N.4. ANSI N45.2.12 Section 4.3.1 Pre-audit and post-audit conferences may be fulfilled by a variety of communications, such as telephone conversation.**	RBS USAR Section 1.8 page 204.		

Number	Comment	Response	Closed?	Submit?
	Section 4.3 does not appear to place any restrictions on the communication method and therefore this is acceptable. (RB QAP was referenced here but I did not see a reference to communications method. Where did this come from?) See L18.			
Q-48	**Table 1 N.5. ANSI N45.2.12 Section 4.3.1 Pre-audit and post-audit conferences are only held when deemed necessary by quality assurance or when requested by the audited organization.** This is consistent with an exception for RG1.144, item 3 in the QAP approved by the NRC for W3. However, could wording such as "... are normally conducted, except were they would interfere with the nature or schedule of the audit, e.g. unannounced audits, persons normally attending audit not available, etc." This wording might better capture the intent of the standard and that of the approved exception for GG. See L19.	If the quality assurance organization does not feel that the audit and/or finding need a conference with the audited organization and the audited organization does not feel a need for the meeting, what purpose is the conference achieving? The purpose of the W3 exemption is to allow judgement be used to determine when a conference would achieve a useful purpose. Having a conference just for the sake of having a conference detracts resources from more important tasks.		
Q-49	**Table 1 N.7. ANSI N45.2.12 Section 4.3.3 Pre-audit and post-audit conferences are only held when deemed necessary by quality assurance or when requested by the audited organization.** This is consistent with an exception for RG1.144, item 3 in the QAP approved by the NRC for W3. However, could wording such as "... are normally conducted, except were they would interfere with the nature or schedule of the audit, e.g. unannounced audits, persons normally attending audit not available, etc., or formally deemed as unnecessary" This wording might better capture the intent of the standard and that of the approved exception for GG. This is the same comment as the pre-audit comment above, only it would seem even more important in the case of post-audit as findings could be discussed. See L19.	If the quality assurance organization does not feel that the audit and/or finding need a conference with the audited organization and the audited organization does not feel a need for the meeting, what purpose is the conference achieving? The purpose of the W3 exemption is to allow judgement be used to determine when a conference would achieve a useful purpose. Having a conference just for the sake of having a conference detracts resources from more important tasks.		
Q-50	**Table 1 N.8. ANSI N45.2.12 Section 4.3.3 Pre-audit and post-audit conferences may be fulfilled by a variety of communications such as telephone conversation.** Section 4.3 does not appear to place any restrictions on the communication method and therefore this is acceptable. (RB QAP was referenced here but I did not see a reference to communications method. Where did this come from?) See L18.	RBS USAR Section 1.8 page 204.		
Q-51	**Table 1 N.10. ANSI N45.2.12 Section 4.5.1 The QAPM Section A.6 corrective action program may be used instead of these requirements. Also, no additional documentation is necessary if needed corrective actions are taken and verified**	ANO Att 3 page 163 provides the basis for the first sentence. The only part of the ANO exemption that is not addressed is the 30 day requirement.		YES

Number	Comment	Response	Closed?	Submit?
	prior to audit report issuance. This does not appear to be completely consistent with the intent of the standard or the cited exception to RG1.144 item 11 in the QAP approved by the NRC for GG. The GG exception merely states that written response is not necessary if corrective action is taken and verified prior to issuance of the audit report. Therefore the second sentence above is consistent, however, the first is not. If something to the effect that "... to meet these requirements provided the same type of follow-up information and schedules are met." replaces "... instead of these requirements.", then this might be acceptable. See L20.	Change the exemption to the following: The QAPM Section A.6 corrective action program may be used instead of these requirements **as long as the appropriate time limits are applied to significant conditions adverse to quality**. Also, no additional documentation is necessary if needed corrective actions are taken and verified prior to audit report issuance.		
Q-52	**Table 1 O.2. ANSI N45.2.23 Instead of the requirements of this section, the following may be Section 2.3.4 implemented: "Prospective lead auditors shall demonstrate their ability to effectively implement the audit process and lead an audit team. Upon successful demonstration of the ability to effectively lead audits, licensee management may designate a prospective lead auditor as a lead auditor."** The basic concept of demonstration of skills for lead auditors was previously approved by the NRC for SONGS. The following exception was found acceptable: "Prospective Lead Auditors shall demonstrate their ability to effectively implement the audit process and effectively lead an audit team. This process is described in written procedures which provide for evaluation and documentation of the results of this demonstration. In addition, the prospective Lead Auditor shall have participated in at least one Nuclear Oversight audit within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI/ASME N45.2.23-1978, the individual may be certified as being qualified to lead audits." The NRC determined that the alternative for lead auditor qualification proposed by SONGS represents an acceptable alternative to Item 18B3 of SRP 17.1 which is referenced in the criteria for audits in SRP 17.2. This determination was based on the licensee's proposed quality assurance program controls which require that 1) prospective lead auditors effectively demonstrate their ability to implement the	The documentation and procedure discussion in the SONGS SER is covered by QAPM A.1.d. The SONGS SER statement "and having met the other provisions of Section 2.3 of ANSI/ASME N45.2.23-1978" is covered by the fact that this clarification only applies to Section 2.3.4 which only discusses the number of audits requirement. I'll modify the clarification to discuss the one audit item from the SONGS SER. Prospective lead auditors shall demonstrate their ability to effectively implement the audit process and lead an audit team. **They shall have shall have participated in at least one audit within the year preceding the individual's effective date of qualification.** Upon successful demonstration of the ability to effectively lead audits, licensee management may designate a prospective lead auditor as a lead auditor.		YES

Number	Comment	Response	Closed?	Submit?
	audit process and lead an audit team, 2) this demonstration process be described in written procedures or instructions, 3) the results of the demonstration be evaluated and documented, and 4) regardless of the methods used for the demonstration, the prospective lead auditor shall have participated in at least one nuclear oversight audit within the year preceding the individual's effective date of qualification. In addition to the above, the alternative also states that all other provisions of Section 2.3 of ANSI N45.2.23-1978 regarding qualification of lead auditors will be met prior to the individual's certification.			
Q-53	Section B. "PERFORMANCE/VERIFICATION" includes many statements and commitments that are verbatim repeats from SRP-17.3. In general consistent with the requirements of §50.34(b)(6)(ii), the staff is looking for additional explanatory information regarding the method the licensee will adopt to implement the commitments. Examples include: - Section B.2.a.: What are the design control program provisions that assure that design activities are executed in a planned, controlled, and orderly manner? - Section B.2.b.: What are the provisions to control design inputs, processes, outputs, changes, interfaces, records and organizational interfaces? - Section B.2.g.: What are the interface controls for the purpose of developing, reviewing, approving, releasing, distributing, and revising design inputs and outputs to be defined in procedures? - Section B.3.e.: Which are the individuals and groups responsible for design reviews or other verification activities? What are their authorities and responsibilities? - Section B.4.b.: What are the provisions for evaluating prospective suppliers and selecting qualified suppliers? - Section B.4.c.: What are the provisions for ensuring that qualified suppliers continue to provide acceptable products and services? Section B.5.a.: What are the provisions of the program to verify the quality of purchased items and services? These are examples of areas that require further amplifying	We feel that the level of detail provided in the proposed QAPM in conjunction with the commitments to the Regulatory Guides and associated ANSI Standards provide sufficient detail to meet the regulatory requirements. In most cases the level of detail provided in consistent with the level of detail previously accepted on the specific item of interest for at least one of the Entergy plants. If during the course of the review an item that was previously in the Entergy QA Plans and is needed to meet a regulatory requirement is identified that is not included in the proposed QAPM, we will address it on a case by case basis. Specifically, what details have we removed from the plan that is required?		

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	discussions. There are many others in the various areas of the QAPM. All areas should be reviewed and expanded upon as appropriate.			
Q-54	Manager of QA responsible for establishing, controlling and verifying implementation of the QAP (no mention of implementation); who reports to the Manager of QA? What functions are carried out by staff reporting to Manager of QA? To whom does the Manager of QA report? (Question the validity of L.26 due to an undefined layer of management between the executive position and the QA function position.)	The staff who reports to the QA manager performs the functions identified. As discussed in A.2 "The authority to accomplish the quality assurance functions described is delegated to the incumbent's staff as necessary to fulfill the identified responsibility." Providing extensive details concerning the lower levels of the organization detracts from the clarity of the commitment. When the details of X number of supervisors report to the manager and the supervisors have Y responsibilities are in the QA plan it is difficult to identify the important characteristics of the commitment which must be protected. For example is going from 2 supervisors to three supervisors a reduction in commitment because you have diluted the authority and scope of control of the 2 previous supervisors? Conversely, is going from 3 supervisors to 2 supervisors a reduction in commitment because you have reduced management oversight of the individual workers? Allowing a single layer of management between the QA manager and the VP was previously accepted in the RBS QA plan. RBS had a director position with responsibility for QA and EP functions and a QA Manager that reported to the director. In the past the director also had Licensing as a report.		
Q-55	Discussion of Change L.1 says "In all cases, the positions will maintain sufficient authority and organizational freedom to implement the assigned responsibilities." This general criterion is good, but we need further information that demonstrates how this done.	One way this is performed is by the QAPM requirement concerning the organizational level of the managers involved. For the QA manager's position additional information is contained in QAPM A.2.d.1 and A.4.d What previously implemented acceptance criteria for the positions is missing.		
Q-56	Section A.2.d (pp 8/9); no mention of QA responsibilities for these managers	The responsibilities identified are the QA responsibilities of the identified management position. Additionally, "The requirements and commitments contained in the QAPM are mandatory and must be implemented, enforced, and adhered to by all individuals and organizations." What specific responsibilities are not addressed?		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-57	Executive responsible for operations and nuclear safety appears to have no responsibility for QAP implementation.	A.2.c.1 states that the executive responsible for overall plant nuclear safety at each site is responsible for establishing policies, goals, and objectives of the quality assurance program at the respective site		
Q-58	Is there a manager of maintenance?	A.2.d.2		
Q-59	QA functional responsibilities - If line organization personnel perform inspections, are personnel trained in QA technology?	Table 1 Item G provides Entergy's commitments to Regulatory Guide 1.58 "Qualifications of Nuclear Power Plant Inspection, Examination, and Testing Personnel."		
Q-60	QA functional responsibilities - What is the extent of performance monitoring by the QA organization to assure proper QAPM implementation?	QAPM Section C provides a identification of the audit program. QAPM A.3.d requires an annual assessment of the QA program implementation.		
Q-61	QA functional responsibilities - In the RBS QAP (see QAD-1, section 4.1.3), the Vice President, Operations maintains awareness of QA matters and QAP effectiveness by review of: - audit and assessment results - open item status reports - NRC inspection reports - independent management assessments/audits - operating experiences Are these responsibilities assigned to an executive in the new QAPD (see section A.2.c)? The responsibilities of these executives should be further described with regard to their management and guidance of plant activities through the managers that report to them.	As discussed in QAPM A.2.c.1, the VP at each site is responsible for overseeing activities of the associated off-site safety review committee. In accordance with the commitments to ANSI N18.7 the off-site review committee reviews this type of information. Additionally QAPM A.3.c requires that the adequacy of the QAPM's implementation is assessed annually by the manager(s) responsible for quality assurance and reported to the associated VP. The current QA plans did not all provide the same level of detail in the discussion of the VP's function that RBS had. The proposed QAPM provides sufficient detail.		
Q-62	Do the responsibilities of the executive for overall plant nuclear safety (Section A.2.c.1.) also include cognizance of NRC inspection activities, industry experiences, LERs, GLs, bulletins, and other in-house events (see ANO section 1.0 Organization, section 1.3.2, Director Nuclear Safety) ?	I don't understand the question. The executive responsible for overall plant nuclear safety at each site is responsible for establishing policies, goals, and objectives of the quality assurance program at the respective site and overseeing activities of the associated off-site safety review committee. Some of the specific items reviewed by the VP and his reports are described in the QAPM and associated		

Number	Comment	Response	Closed?	Submit?
		commitments. The current QA plans did not all provide the same level of detail in the discussion of the VP's function.		
Q-63	Previous commitments for implementation of QA functions not found in the QAPM: ANO: Executives/Directors and managers are responsible for QAP implementation; Director Quality responsible for implementation (pp. 10/11); Section 2.3.2 states "that individuals responsible for verification of conformance are qualified and do not perform or directly supervise the work."	QAPM B.12.a "Inspections are performed by qualified personnel other than those who performed or directly supervised the work being inspected."		
Q-64	Previous commitments for implementation of QA functions not found in the QAPM: River Bend: Manager QA responsible for implementation of the QAPM (p. 12/13)	QAPM A.2.d.1 "The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the quality assurance program as described in this QAPM."		
Q-65	Previous commitments for implementation of QA functions not found in the QAPM: Grand Gulf: Director, Quality "provides" for implementation of the QAP (See "Organization", p.2 of 14 and Section 10.0, "Inspection", pp.1/2 of 5)	QAPM A.2.d.1 "The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the quality assurance program as described in this QAPM."		
Q-66	Previous commitments for implementation of QA functions not found in the QAPM: - Waterford: Director of Quality responsible for implementation of QAP (pp. 8-10); inspections done by QA personnel, line organization personnel (peer maintenance), and contract personnel); QUESTION: A.1 rationale for deletion (p.111)???	QAPM A.2.d.1 "The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the quality assurance program as described in this QAPM."		
Q-67	Independent Review Program - QAPD, Section A.2.e. provides a general statement of the purpose of the on-site and off-site safety review committees. Section A.2.c.1. states that the Executive, Overall Plant Nuclear Safety, is responsible for overseeing the activities of the off-site safety review committee. Section A.2.d.2.i. indicates that the Manager, Plant Operations is functionally responsible for the on-site safety review committee. Table 1 indicates a commitment to RG 1.33 and ANSI N18.7 with an exception to Section 4.3.1 regarding the experience applicable to the on-site review committee, and the experience for the off-site	See Q-11 for a discussion of the committee make-ups.		

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	committee (majority of areas). Please explain more specifically the requirements for members of these committees. What will be the membership composition of each of these committees? In addition, an exception is taken to Section 4.3.2.3 whereby members with line responsibility for operation of the plant may now constitute a majority of the quorum for the on-site SRC (see QAPM p.23). OK.			
Q-68	Independent Review Program Per Section 4.3.2.4 of ANSI N18.7, meeting minutes will be disseminated promptly. No commitment for timely submittal of audit reports (Standard is silent).	ANSI N45.2.12 along with Clarification N.9 require the audit report to be issued within thirty working days after the last day of the audit.		
Q-69	Independent Review Program No commitment on PORC meeting frequency per Section 4.3.2.2 of ANSI N18.7 (per 14, will be in procedures).	We're committing to ANSI N18.7 Section 4.3.2.2 as a minimum meeting frequency. Any increased frequency that we require will be identified in procedures.		
Q-70	Independent Review Program Table 1 takes exception to Section 4.3.4(4) of ANSI N18.7. Will onsite and offsite SRCs review violations also? (Violations seem to be omitted in the clarification)	See Q-14. Section 4.3.4(4) was discussing violations that were reportable via a 24 hour report.		
Q-71	Independent Review Program ANO - SRC has 8-12 members - Qualifications satisfy all technical areas - Meeting minutes within 14 days - Meeting once per calendar month - No exception to N18.7 §4.3.4(4)	For the number of members we are committing the ANSI N18.7 Section 4.3.2.1. The number is consistent with the W3 requirements. For a discussion on Qualifications see Q-11. For timeliness of meeting minutes we are committing to ANSI N18.7 Section 4.3.2.4. The specific number of days is a procedural detail not included in N18.7. SRC meeting frequency ~~was~~ is once per 6 months per ANO 1.3.9.1.3.1. Frequency is maintained by commitment to N18.7 Section 4.3.2.2.		
Q-72	Independent Review Program RBS - NRB is responsible for evaluating the scope, implementation and effectiveness of the QA program (QAD-1, REV-14C, p.18 of23, top	QA program review. We are committing to the ANSI Standard. The specifics that you identified in the current RBS program don't appear in all of the other programs. N18.7 provides sufficient description of the base requirements including the requirements of N18.7 Section 4.5 ~~which~~ requires that audit reports be sent to		

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	bullet); ANSI N18.7 (Section 4.3.4(5)) is cited as a replacement in the QAPM; but this section is very general. Table 1 should be more specific as to the subject matter to be addressed under this standard provision. - RBS takes no exceptions to ANSI N18.7 for the offsite independent review committee in the following areas [QAD-1, pp. (4), (5), & (6)]: - NRB has 9 to 13 members - Qualifications satisfy all technical areas - Meeting minutes within 14 days - Records of NRB reviews to VP-Ops in 14 days - No exceptions to ANSI N18.7 §4.3.4(4)	the off-site committee. Section 4.5 and the clarification also require the off-site For the number of members we are committing the ANSI N18.7 Section 4.3.2.1. The number is consistent with the W3 requirements. For a discussion on Qualifications see Q-11. For timeliness of meeting minutes we are committing to ANSI N18.7 Section 4.3.2.4. The specific number of days is a procedural detail not included in N18.7.	associated off-site safety review Committee to review the QA program every 6 months.	
Q-73	Independent Review Program RBS - RBS takes no exceptions to ANSI N18.7 for the onsite independent review committee in the following areas [QAD-1, pp. (1), (2), & (3)]: - FRC has 6 to 11 members - Meeting frequency is at least once per month - Responsibilities of the FRC [QAD-1, p.18(2), bottom of sheet] seem to be transferred to the onsite operating organization under ANSI N18.7 §4.4. OK based on identical composition of the FRC.	For the number of members we are committing the ANSI N18.7 Section 4.3.2.1. We're committing to ANSI N18.7 Section 4.3.2.2 as a minimum meeting frequency. Any increased frequency that we require will be identified in procedures.		
Q-74	Independent Review Program Waterford - Waterford takes no exceptions to ANSI N18.7 for the SRC. - SRC has at least five members - Qualifications of members meet ANSI/ANS3.1-1978, Section 4.7 - Meet at least once per six months.	For the number of members we are committing the ANSI N18.7 Section 4.3.2.1. The number is consistent with the W3 requirements. We're committing to ANS3.1 1978 for all personnel (Table 1 A.1). We're committing to ANSI N18.7 Section 4.3.2.2 as a minimum meeting frequency (6 months). For timeliness of meeting minutes we are committing to ANSI N18.7 Section 4.3.2.4. The specific number of		

Number	Comment	Response	Closed?	Submit?
	- Meeting minutes within 14 days - Minimal exceptions taken to ANSI N18.7 in other areas. - Audit reports forwarded to affected management within 30 days. - PORC reviews design changes and site nonconformance documents which have dispositioned as "use as is" or "repair" (See para. 4.3.1.3, page 4). Does the clarification to ANSI N18.7 Section 4.3.4(4) include these responsibilities for the on-site safety review committee? PORC meets once per month.	days is a procedural detail not included in N18.7. ANSI N45.2.12 along with Clarification N.9 require the audit report to be issued within thirty working days after the last day of the audit. PORC review of design changes and site nonconformance documents which have dispositioned as "use as is" or "repair" is one way that W3 meets the clarification to ANSI N18.7 Section 4.3.4(4). For PORC meeting frequency we're committing to ANSI N18.7 Section 4.3.2.2 as a minimum meeting frequency. Any increased frequency that we require will be identified in procedures.		
Q-75	A duty of the General Manager, Plant Operations is "analyzing conditions for trends regarding equipment failure, and publishing a quarterly trend report" (See para. 4.3.1.5 on page 4). How is this responsibility handled in the QAPM? According to para. 4.6.1.5 and 4.6.1.6 on p. 7, these functions fall under the manager for corrective action (A.2.d.7 of the QAPM). Suggest this be stated in the QAPM.	The QAPM requires this to be perform by the manager responsible for corrective action A.2.d.7 and A.6.e.		
Q-76	How are the responsibilities identified in para. 4.3.1.20 through 4.3.1.28 on p. 5 handled in the QAPM?	A.2.d.2 provides the necessary requirement.		
Q-77	Lead Auditor Qualifications - Table 1, RG1.146, Item 2 (ANSI N45.2.23, section 2.3.4) should be supplemented by the following or words similar to the following:: "The process for demonstrating the ability to lead an audit team shall be documented in a procedure that requires evaluation and documentation of the results of the demonstration."	See Q-52		
Q-78	Auditing - Item C.10, Table 1 of the QAPM takes exception to ANSI N18.7, Section 4.5 with respect to frequency of audits. However, both the standard and Section C.2.a.2 seem to say that audits of the listed activities will be performed at least every two years. What is the reason for taking the exception?	QAPM C.2.a.1 allows the implementation of a performance based audit program as was previously approved for GGNS.		
Q-79	River Bend was committed to engaging "at least annually, a qualified auditing organization, independent of the organization being reviewed to assess REBS safety-related activities." (See QAD-1. REV-14C, page 17 of 23) The QAPM states (Item A.3.c., p.4) that "the adequacy	Only RBS had this commitment. QAPM A.3.c requires "The adequacy of the QAPM's imple.nentation is assessed annually by the manager(s) responsible for quality assurance and reported to the chief executive		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	of the QAPM's implementation is assessed annually by the manager(s) responsible for quality assurance...". How is the R/B commitment for independent audits satisfied in the QAPM?	officer and the associated executive for overall plant nuclear safety." The team makeup is a procedural detail that was removed from the QAPM.		
Q-80	RBS - QAD-1, page 18(6), para. TR 5.9.1, items f.. g., h., and I. don't seem to be included in N 45.2.9, section 3.2.7 and Appendix A.	All of the plants have a list of items to review with the consistent theme being REPORTABLE EVENTS (i.e., 10 CFR 50.73). The other requirements varied from plant to plant and the intent seemed to be to detect potential nuclear safety hazards. We have tried to identify the acceptance criteria for the review and move some of the details to procedures.		
Q-81	Qualifications: - Equivalency for a bachelor's degree is provided on page 21 of the QAPM (Table 1). This is identical to the commitment in GGNS, Appendix A, clarification to the provisions of ANSI/ANS 3.1 (R.G. 1.8). What are the equivalency commitments for the remaining three plants? Also, I didn't see an equivalency statement in the standard. In fact, section 4.4.5 of the standard requires a bachelor's degree AND appropriate experience, whereas the QAPM commitment requires a bachelor's degree OR certain levels of experience which appear to be rather minimal. - Waterford 3 meets the ANSI standard (see section 4.7.1.1 on p. 8).	See Q-6 Section 3.2.7 requires that for records not listed in Appendix A the type most nearly describing the record in question should be followed.		
Q-82	QA Programs for Principal Contractors and Suppliers: - Waterford (Section 5.10.3, page 32) establishes controls for changes to the QA programs for principal contractors and suppliers and their subcontractors. The QAPM referenced sections do not explicitly identify such controls (A.3.a and A.3 b).	QAPM A.3, B.4.a and B.4.e and the commitments to N45.2.13 along with the reporting requirements of 10CFR50. W3 was the only unit to have this level of detail.		