

LICENSEE: Entergy Operations, Inc. November 2, 1998

FACILITIES: Arkansas Nuclear One, Grand Gulf, River Bend, and Waterford

SUBJECT: SUMMARY OF MEETING HELD ON OCTOBER 7, 1998, TO DISCUSS REVIEW STATUS OF THE STANDARD QUALITY ASSURANCE MANUAL

On October 7, 1998, the staff met with representatives from Entergy Operations, Inc. to discuss the status of review of the standard quality assurance 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 dated October 8, 1998, 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 to focus the final review.

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

cc w/atts: See next page

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

November 2, 1998

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A handwritten signature in black ink, appearing to read "D. Wigginton".

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ENERGY OPERATIONS, INC.

STANDARD QUALITY ASSURANCE PLAN

MEETING ON OCTOBER 7, 1998; ATTENDEES

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R. Smith	NRR, HQMB
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C. Wells	Entergy
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R. Gramm	NRR, DRCH

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-1	<p>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.</p>	<p>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 activity and not the requirements of the QAPM.</p> <p><b>A.1.c The methods of implementation of the requirements of the QAPM are commensurate with the item's or activity's importance to safety.</b></p> <p><u>8/27/98 Meeting</u> Staff indicated that they would go back and discuss. Proposed words seemed to be acceptable and that the concept was included in Appendix B and the endorsed ANSI Standards.</p>	CLOSED	Yes
Q-2	<p>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.</p> <p>Section B.12.a (p.15); it appears that line organization personnel perform inspections; not clear.</p> <p>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?</p>	<p>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:</p> <p><b>QC personnel</b></p> <p><u>A.6.a</u> 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.</p> <p><u>B.12.a and N18.7 Section 5.2.17</u> 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.</p> <p><u>B.12.d</u> Inspection results are to be documented by the inspector and reviewed by qualified personnel.</p> <p><u>N18.7 Section 5.2.17</u> The owner organization shall evaluate inspection results. Records shall be kept in sufficient detail to</p>		Yes



Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>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.</p> <p><b>QA Manager</b></p> <p><u>A.2.d.1</u> 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.</p> <p><u>C.1.c</u> Personnel performing audits have no direct responsibilities in the area they are assessing.</p> <p><u>N18.7 Section 4.5</u> 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.</p> <p><b>Conclusion</b></p> <p>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.</p> <p>An editorial change associated with respect to this item is to add a cross reference to RG 1.33 in QAPM B.12</p> <p>B.12.f Additional details concerning inspections may</p>		

**Entergy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
		<p>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).</p> <p><u>8/27/98 Meeting</u> The Staff provided a conceptual functional organization chart which showed a special reporting relationship between personnel performing the QC function and the QA Manager. ECI indicated that as discussed above they do not feel that this special reporting relationship is necessary. Staff will consider the information provided.</p> <p><u>Post 8/27/98 meeting</u></p> <p>In response to a later question and RG 1.58 to this insert. New insert:</p> <p><b>B.12.g 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 Guides 1.33 and 1.58).</b></p> <p>Although not required by the ANSI Standard consistent with the GGNS requirements the following will be added to the QAPM. As part of this change delete the last sentence of B.12.a and add it to the proposed new item.</p> <p>B.12.a A program is established and implemented for inspections of activities in order to verify conformance to the documented instructions, procedures and drawings for accomplishing the activity. The inspection program may be implemented by or for the organization performing the activity to be inspected. <del>Inspections are performed by qualified personnel other than those who performed or directly supervised the work being inspected.</del></p> <p>B.12.f Inspections are performed by qualified personnel</p>		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>other than those who performed or directly supervised the work being inspected. While performing the inspection activity the inspectors functionally report to the associated manager responsible for quality assurance or a manager responsible for materials, purchasing, and contracts as appropriate.</p> <p>10/7/98 meeting Discussed the proposed changes. With the proposed changes are acceptable but EOI is to provide information concerning the previous NRC review of the procurement reporting responsibilities.</p>		
Q-3	<p>Need to clarify the duties and reporting responsibilities of any line organization QA functional responsibilities. One method may be a functional chart.</p> <p>Additional NRC discussion:</p> <p>NRC requirements to demonstrate organizational acceptability:</p> <p>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.</p>	<p>A licensee's organization description needs to contain sufficient detail to provide reasonable assurance of 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.</p> <p>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.</p> <p>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.</p> <p>Specific discussions</p> <p>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</p>	CLOSED	

**Entergy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
		<p>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.</p> <p>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.</p> <p><u>8/27/98 Meeting</u> The Staff provided a conceptual functional organization chart. EOI discussed that they did not feel that the chart was necessary since the applicable controls were in the proposed QAPM. EOI voiced the concern that the inclusion of the chart could result in the real organizational requirements being masked by the other information provided in the chart. Staff will consider the information provided.</p>		
Q-4	<p><b>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.</b></p> <p>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?</p>	<p>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.</p> <p>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.</p> <p>Future changes to the TS will be controlled in accordance with 10 CFR 50.92 which requires prior NRC approval.</p>		

**Entergy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
	<p><u>Post 8/27/98 meeting</u></p> <p>The general qualification requirements suggested appear different from any currently used at any of the facilities and from any other past exceptions that I am aware of. Therefore I am referring this to the other QA reviewers and the human factors section for there insights too. Initial comments seem to be along the line of why not commit to the current version of the Reg Guide, the current version or currently approved exception for that plant, or something like this?</p>	<p><u>8/27/98 Meeting</u> Staff will consider the information provided. Staff requested the EOI provide any information available concerning the current requirements including the source (e.g., TS amendment). File sent to Staff showing requirements currently in QA plan and TS on 8/31.</p> <p><u>Post 8/27/98 meeting</u></p> <p><u>ANO U2 TS 6.3.1</u> Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the designed radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.</p> <p><u>GGNS TS 5.3.1</u> Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as modified by Specification 5.2.2.f, except for the radiation protection manager and the STA, who shall meet or exceed the education and experience requirements of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, 1987.</p> <p><u>RBS TS 5.3.1</u> Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory guide 1.8, September 1975.</p> <p><u>W3 TS 6.3.1</u> Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions except that:</p> <p>a. The Radiation Protection Superintendent shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.</p>		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>b. Personnel in the Health Physics, Chemistry and Radwaste Departments shall meet or exceed the qualifications of ANSI N18.1-1971.</p> <p>c. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualification of 10 CFR Part 55.</p> <p>d. Personnel in the Nuclear Quality Assurance Department, and other staff personnel who perform inspection, examination, and testing functions, shall meet or exceed the minimum qualifications of Regulatory Guide 1.58, Rev. 1, September 1980. (endorses ANSI N45.2.6-1978).</p> <p><u>Proposed QAPM</u></p> <p>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.</p> <p>Individuals filling positions who met the previous commitment 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.</p> <p><u>Comparison of the proposed change with that previously approved</u></p> <p>None of the current TS commitment to the RG for as the base requirement. All of them commitment directly to the ANSI standard consistent with the proposed requirement. The proposed commitment matches the current RBS and W3 TS requirements and allows GGNS and ANO to upgrade their commit from ANSI N18.1 1971 to ANS 3.1 1978 as positions are filled in the future.</p> <p>As an alternate to the proposed requirements, since the</p>		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>qualifications requirements are in the TS and therefore under NRC control, we could remove the commitments from the QAPM.</p> <p><u>10/7/98 meeting</u> Changes appear to be acceptable. EOI to review the differences between the 1978 and 1981 versions of ANS 3.1 for onsite and the off-site safety review committees. If there are not any significant differences the item is accepted.</p>		
Q-5	<p><b>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.</b></p> <p>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?</p>	<p>The main problem with the addition is that many positions did not have any qualifications in ANSI 18.1 1971.</p> <p>What about a change to:</p> <p>Individuals filling positions at the time of implementation of this commitment can be considered to meet <b>any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.</b></p> <p><u>8/27/98 Meeting</u> The following words were agreed to:</p> <p>Individuals filling positions <b>who met the previous commitment</b> at the time of implementation of this commitment can be considered to meet <b>any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.</b></p>	Closed	Yes
Q-6	<p><b>Table 1 A.2. General The following qualifications may be considered equivalent to a bachelor's degree:</b></p> <p>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.</p> <p>This is an existing exception from GG. See L20.</p>	<p>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.</p> <p>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.</p>		YES

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>1) Are all the units' Tech Specs consistent with this? If tech specs specify bachelor, is a bachelor degree required rather than this option?</p> <p>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?</p> <p>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</p> <p>4) When was this exception incorporated? What was the justification?</p>	<p>8/27/98 Meeting Staff expressed concerned that years of experience used to meet the education requirements as allowed by the exception should not be used to meet the Standard's experience requirements.</p> <p>Post 8/27/98 meeting 8/27/98 meeting /27/98 meeting /27/98 meeting /27/98 meeting Staff position is consistent with practice. Add the following to the bottom of clarification.</p> <p><b>Years of experience used to meet the education requirements as allowed by this exception shall not be used to also meet the experience requirements.</b></p> <p>10/7/98 meeting Issue discussed if EOI can change the word "formal" to "post secondary" in item A of the clarification the clarification is acceptable.</p>		
Q-7	<p><b>Table 1 B.3. ANSI N45.2.4 Section 3 Documented routine inspections and audits of the storage area may be performed instead of the requirements of this Section.</b></p> <p>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.</p>	<p>It's implied by the section it is referencing.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-8	<p><b>Tab<sup>1</sup>a 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.</b></p> <p>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</p>	<p><b>Will remove the clarification.</b></p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	YES



Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	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.			
Q-9	<b>Table 1 C. 1. Section C.1 Entergy will provide procedures for the guide's Appendix A activities as discussed. However Entergy does not consider all activities listed to be safety-related" (e.g., activities in 7.e).</b>  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.  <u>8/27/98 meeting</u> Discussed in the meeting issue resolved.	CLOSED	
Q-10	<b>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.</b>  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.	There 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.  <u>8/27/98 meeting</u> Discussed in the meeting issue resolved.	CLOSED	
Q-11	<b>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 supervisor; personnel. Additionally, the off-site safety review committee need contain experience in only a majority of the areas.</b>  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 come from GG UFSAR p16B.1-207, referenced in the QAP, which states "In the aggregate, the membership of the committee shall	The are 2 separate committees discussed in this section 1) the onsite safety review group and the offsite safety review group.  <u>On-site safety review committee-site safety review committee-site safety review committee-site safety review committee-site safety review committee</u>  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 <u>on-site safety review committee</u> . The current requirements at the sites basically say that the	CLOSED	

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	<p>provide specific practical experience in the majority of the disciplines of 7.4.2.1a through h." See L19 and L20</p>	<p>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.</p> <p><u>Off-site safety review committee-site safety review committee-site safety review committee-site safety review committee-site safety review committee</u></p> <p>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 &amp; 4.9.3 (a.k.a. SRC)</p> <p>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.</p> <p><u>8/27/98 Meeting</u>                      Staff will consider the information provided.</p> <p><u>10/7/98 meeting</u>                      Issue discussed and resolved.</p>		
Q-12	<p><b>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.</b></p> <p>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</p>	<p>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)</p>	CLOSED	

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	<p>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." <i>What is the purpose of this item 6 clarification? Isn't commitment to the RG enough? See L20.</i></p>	<p>provides the needed guidance; therefore, exception to Section 4.3.4(2) was taken for clarity.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>		
Q-13	<p><b>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.</b></p> <p>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.</p> <p><u>Post 8/27/98 meeting/27/98 meeting/27/98 meeting/27/98 meeting</u> Still considering but a combination of the original and most recent wording might be closer. i.e.:</p> <p><b>Revision to proposed Technical Specification or license changes only require a complete review in accordance with this section when the revision involves a significant change to the technical basis for the proposed change. Otherwise, this requirement is implemented by reviewing the no significant hazards considerations evaluation for the proposed change prior to submittal to the Commission for approval.</b></p>	<p>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 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.</p> <p>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).</p> <p>8/27/98 Meeting Staff was concerned that the changes to the No Significant Hazards may not be the correct threshold for when reviews of revisions are needed. Significant changes to the technical basis may be a better threshold.</p> <p><u>Post 8/27/98 meeting/27/98 meeting/27/98 meeting/27/98 meeting</u> Revise the clarification to the following: <b>Revision to proposed Technical Specification changes only require review in accordance with</b></p>	CLOSED	YES

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		<p>this section when the revision involves a significant change to the technical basis for the proposed change.</p> <p>Questions/concerns with NRC proposed wording: What is meant by "a complete review"? Either they review the change again or they don't. If there isn't a technical change in the proposed revision then what is the purpose of reviewing the No Significant Hazards again? They already reviewed the original submittal.</p> <p>10/7/98 meeting Issue discussed and resolved.</p>		
Q-14	<p><b>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.</b></p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>Also, GGNS (Att. 4 page 92 item 11) took exception to this entire section and replaced it with the inserted UFSAR pages.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-15	<p><b>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:</b></p> <p>a. new and revised station administrative procedures and</p> <p>b. changes to the Emergency Plan (except editorial changes).</p> <p>4.3.4(5) deals with other matters involving safe operation of the</p>	<p>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".</p> <p>We will change the words to the following:</p> <p><b>Examples of the matters reviewed by the on-site</b></p>	CLOSED	YES

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	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 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.	safety review committee in accordance with this section are the following:  <u>8/27/98 meeting</u> Discussed in the meeting issue resolved.		
Q-16	<b>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.</b>  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.  <u>8/27/98 meeting</u> Discussed in the meeting issue resolved.	CLOSED	
Q-17	<b>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.</b>  <i>Consistent with the QAP approved by the NRC for RB? Where is this in the RB QAP? See L21.</i>	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.  <u>8/27/98 meeting</u> Discussed in the meeting issue resolved.	CLOSED	
Q-18	<b>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.</b>  The basis for this GG UFSAR page 16B.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	CLOSED	

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	<p>Post 8/27/98 meeting Should something be added to the end of this exception along the lines of ... provided the SRO in charge of the shift is notified prior to approving the change.?</p>	<p>provides sufficient controls to insure knowledgeable operations involvement while allowing for the workload on shift personnel to be controlled.</p> <p>8/27/98 Meeting Staff will consider the information provided.</p> <p>Post 8/27/98 meeting The proposed clarification is consistent with the current GGNS exception. QAPM B.14 requires that a process is in place to ensure that the SRO in charge of the shift and others use the correct procedure.</p> <p>B.14 d. Copies of controlled documents are distributed to and used by the person performing the activity.</p> <p>e. The distribution of new and revised controlled documents is in accordance with procedures. Superseded documents are controlled.</p> <p>10/7/98 meeting issue discussed and resolved.</p>		
Q-19	<p><b>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.</b></p> <p>The basis for this GG UFSAR page 16B.1-208 &amp; 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.</p>	<p>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.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-20	<p><b>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.</b></p>	<p>The wording of the clarification is too broad. The intent was that the discussion concerning the control of nonconforming conditions be taken exception to by this</p>	CLOSED	YES

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Number	Comment	Response	Closed?	Submit?
	<p>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.</p>	<p>clarification.</p> <p>Revise the clarification to the following:</p> <p>"Instead of the requirements of this section <b>concerning non-conforming conditions</b>, non-conforming conditions will be evaluated and controlled in accordance with the corrective action program."</p> <p>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. It was considered preferable to leave all of the details in the GL 91-18 program.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>		
Q-21	<p><b>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.</b></p> <p>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 <b>routine tasks such as the additions of temporary jumpers or gauges as part of maintenance, calibration, or troubleshooting</b>, 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.</p>	<p>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 the proposed words more accurately reflect the requirement as discussed in N18.7. N18.7 required "[a] log shall be maintained of the current status of such temporary modifications."</p> <p>The proposed words require the activities be "adequately documented to indicate the status of the temporary modification."</p> <p>Modify the exception to state:</p> <p>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. <b>These procedures shall</b> provide assurance that approvals are obtained, temporary modification activities are <b>independently verified by an individual cognizant of the purpose and the effect of the temporary modification</b>, and that activities are adequately documented to indicate the status of the temporary modification.</p>	CLOSED	YES

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		<p>8/27/98 Meeting With the addition of "for routine tasks" between "modifications" and "installed" this item is acceptable.</p> <p>Post 8/27/98 meeting 8/27/98 meeting/27/98 meeting/27/98 meeting/27/98 meeting Change the clarification to the following:</p> <p>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 <b>for routine tasks</b> installed in accordance with procedures. <b>These procedures shall</b> provide assurance that approvals are obtained, temporary modification activities are <b>independently verified by an individual cognizant of the purpose and the effect of the temporary modification</b>, and that activities are adequately documented to indicate the status of the temporary modification.</p>		
Q-22	<p><b>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.</b></p> <p>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 <b>documented</b>. See L20.</p>	<p>QAPM A.1.d provides the documentation requirement.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-23	<p><b>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.</b></p> <p>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</p>	<p>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.</p> <p>8/27/98 Meeting Staff will consider the information provided.</p>	CLOSED	



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	say that here? See L.20 and L.4.	10/7/98 meeting Issue discussed and resolved.		
Q-24	<p><b>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.</b></p> <p>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.</p>	<p>The additional words don't add to the clarity of the requirement. The clarification proposed provides an adequate description of the QA requirements.</p> <p>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).</p> <p><u>8/27/98 Meeting</u> Staff is concerned over the accessibility of the information to the user of the equipment and whether personnel will insure that they are using calibrated equipment. What in the QAPM requires that personnel insure that they are using calibrated equipment no matter the difficulty in obtaining the information. EOI will provide additional information.</p> <p><u>Post 8/27/98 meeting</u> One of the items discussed in the NRC proposed words is the amount of information available, EOI is not taking exception to the amount of information provided it is taking clarifying the requirement the statement that the equipment be "suitably marked" (N18.7) and taking an exception to "tagged or labeled" (N45.2.4). GGNS and RBS already has a clarification allowing the use of identifying numbers and cross referencing system to maintain and retrieve the necessary information. In these systems, personnel using the equipment must take the number and look up the calibration status. The acceptability of using alternate methods to perform the function is discussed in SRP 17.3 section b.9 which states "labeled, tagged, or otherwise controlled".</p> <p>The ease of use and therefore the cost of the system is purely an economic issue. Regardless of whether the information is easy or hard to retrieve EOI will be required to have procedures to ensure calibrated information is used.</p> <p>QAPM B.9.a states:</p>	CLOSED	Yes

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		<p>A program is established and implemented to control the calibration, maintenance, and use of measuring and test equipment.</p> <p>QAPM B.9.a states: Measuring and test equipment is calibrated at specified intervals or immediately before use...</p> <p>SRP 17.3 and section QAPM B.9.d states: Measuring and test equipment is to be labeled, tagged, or otherwise controlled to indicate its calibration status and to ensure its traceability to calibration test data.</p> <p><u>10/7/98 meeting</u> Issue discussed and it was agreed that GGNS and RBS clarification allowing the use of identifying numbers and cross referencing system to maintain and retrieve the necessary information was allowed by the words in N18.7. But that N45.2.4 did require clarification. It was agreed to revise the N45.2.4 clarification Table 1 item B.6 to discuss "suitably marked" consistent with N18.7.</p> <p>Make the following changes:</p> <p><b>Delete Table 1 item C.24.</b></p> <p>Modify Table 1 B.6 to state: The last sentence of this section states: "Items requiring calibration shall be tagged or labeled on completion indicating date of calibration and identity of the person that performed the calibration." Instead of requiring the tagging or labeling of all equipment this statement is changed to require the equipment to be <b>suitably marked</b> to indicate the date of the next required calibration and the identity of the person that performed the calibration.</p>		
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	<p>RBS USAR Section 1.8 page 46 Item 2 at the bottom of the page.</p> <p><u>8/27/98 Meeting</u></p>	CLOSED	

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Number	Comment	Response	Closed?	Submit?
	<p>performed to prevent introduction of foreign material. As a minimum, cleanliness inspections are performed prior to system closure and such inspections are documented.</p> <p>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.</p>	<p>Staff will consider the information provided, probably OK.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>		
Q-26	<p><b>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.</b></p> <p>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."</p> <p>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 sulfur and its compounds shall be imposed on expendable products."</p> <p>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</p>	<p>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.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided, probably OK.</p> <p><u>Post 8/27/98 Meeting</u> Revise the clarification to state:</p> <p><b>As an alternate to the requirements of this section, contamination levels in expendable products may be based upon safe practices and industrial availability with documented engineering evaluations.</b> 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.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	YES

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>to the materials group for a technical determination. See L.20.</p> <p><u>Post 8/27/98 Meeting</u></p> <p>This item was discussed with the materials group and another QA staff member with experience in this area. Their position is that this item should be acceptable if the first sentence read more like this:</p> <p>Alternatives to these contamination levels in expendable products may be based upon safe practices and industrial availability with documented engineering evaluations.</p> <p>This would mean, lacking any justification for a particular case, the standard would apply. Yet the licensee has the option of performing engineering evaluations for those cases where they feel other controls are appropriate.</p>			
Q-27	<p><b>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.</b></p> <p>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.</p>	<p>This clarification is based on a clarification to in the RBS USAR. Reference USAR Section 1.8, page 48, item 3.</p> <p>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.</p> <p><u>8/27/98 meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	
Q-28	<p><b>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.</b></p> <p>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.</p>	<p>RG 1.38 does address this issue and the words seem more appropriate. This clarification can be deleted.</p> <p><b>Delete E.21</b> and renumber remaining clarifications.</p> <p><u>8/27/98 meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	YES

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-29	<p>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.</p> <p>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.</p>	<p>This clarification is consistent with a clarification to in the RBS USAR. Reference USAR Section 1.8, page 49, item 6.</p> <p>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.</p> <p><u>8/27/98 Meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	
Q-30	<p>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.</p> <p>This is basically consistent with a clarification for RG1.38 on page T1-7 &amp; 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 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-sulfur, 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 sulfur 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.</p> <p><u>Post 8/27/98 Meeting</u></p> <p>This item was discussed with the materials group and another QA staff member with experience in this area. Their position is that this</p>	<p>The proposed item removed some of the specific details, but engineering evaluations control the materials used.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided.</p> <p><u>Post 8/27/98 Meeting</u></p> <p>Revise the E.26 clarification to state:</p> <p>The last paragraph of A.3.9 could be interpreted as prohibiting any direct marking on bare austenitic stainless steel and nickel alloy 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 <b>based on documented engineering evaluations. Contamination levels are controlled such that the material used for marking is not detrimental to the materials marked.</b></p> <p>Wording of the clarification was modified the be closer to the clarification discussed in Q-26.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	YES

Energy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>item should be acceptable if the last sentence had something like this added:</p> <p>... based on documented engineering evaluations.</p> <p>This would mean, lacking any justification for a particular case, the standard would apply. Yet the licensee has the option of performing engineering evaluations for those cases where they feel other controls are appropriate.</p>			
Q-31	<p><b>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.</b></p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p><u>8/27/98 meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	
Q-32	<p><b>Table 1 F.2. ANSI N45.2.3 This section is not applicable. Section 3.1</b></p> <p>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.</p>	<p>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.</p> <p><u>8/27/98 meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	
Q-33	<p><b>Table 1 F.5. ANSI N45.2.3 Section 3.4 This section is not applicable.</b></p> <p>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.</p>	<p>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.</p> <p><u>8/27/98 meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	
Q-34	<p><b>Table G.2. ANSI N45.2.6 Section 1.2 Paragraph 4 requires that the standard be imposed on personnel other than licensee</b></p>	<p>The first sentence of the last paragraph says that it applies to "personnel of the owners". The proposed</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>employees; the applicability of this standard to suppliers will be documented and applied, as appropriate, in procurement documents for such suppliers.</p> <p>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.</p>	<p>clarification doesn't affect that requirement.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>		
Q-35	<p><b>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.</b></p> <p>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</p>	<p>I don't think there is any difference in the meanings but we'll change the words to:</p> <p>The requirements of this standard do not apply to personnel using <b>later editions of ASNT contained within 10CFR50.55a approved ASME editions or addenda.</b></p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	YES
Q-36	<p><b>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.</b></p> <p>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?</p>	<p>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.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-37	<p><b>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.</b></p> <p>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 be based?</p>	<p>The NQA-1 piece is on ANO Att 3 page 167.</p> <p>The penetrations piece, as indicated on the ANO markup, is based on GGNS Att 4 page 115.</p> <p>8/27/98 Meeting Requirements in the GGNS exception that the penetrations must have the required fire resistance is needed. With that change it is acceptable.</p> <p>Post 8/27/98 meeting /27/98 meeting/27/98 meeting/27/98 meeting</p>	CLOSED	YES

Energy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>Modify the J. 1 clarification to the following:</p> <p>Entergy will meet the requirements of ANSI/ ASME 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 <b>as long as the penetration maintains the required fire resistance.</b></p>		
Q-38	<p>Table 1 J.5. ANSI N45.2.9 Section 5.4.3 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.</p> <p>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</p>	<p>OK</p> <p>Change this exemption to say:</p> <p>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 <b>with appropriate consideration of packaging and storing recommendations as provided by the manufacturer of these materials.</b></p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	YES
Q-39	<p>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.</p> <p>The discussion of penetrations in the first paragraph is consistent with</p>	<p>The NQA-1 piece is on ANO Att 3 page 167.</p> <p>The penetrations piece, as indicated on the ANO markup, is based on GGNS Att 4 page 115.</p> <p>The second paragraph based on RBS USAR Section 1.8 page 135 item c.</p> <p>8/27/98 Meeting Staff will consider the information provided.</p> <p>Post 8/27/98 meeting /27/98 meeting/27/98 meeting/27/98 meeting Modify the J.7 clarification to the following:</p> <p>Entergy will meet the requirements of ANSI/ ASME</p>	CLOSED	YES



Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>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.</p> <p>RB is cited as the source for the second paragraph. How was this arrived at? See L18.</p> <p><u>Post 8/27/98 Meeting</u></p> <p>As was done for Q-37, need to add to the end of the first sentence discussing penetrations ...as long as the penetration maintains the required fire resistance. Also QA staff had the question if this was NQA-1 as endorsed by Reg Guide 1.28 rev 3?</p>	<p>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 <b>as long as the penetration maintains the required fire resistance.</b></p> <p>As reflected in the current ANO clarification shown on Attachment 3 page 167 the commitment is to NQA-1 not RG 1.28 rev 3. I didn't see any exceptions to the fire protection requirements in NQA-1 in RG 1.28 rev 3.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>		
Q-40	<p><b>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.</b></p> <p>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 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?</p>	<p>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 construction codes, where applicable.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided probably OK.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	
Q-41	<p><b>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.</b></p> <p>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.</p>	<p>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.</p> <p><u>8/27/98 meeting</u> Discussed in the meeting issue resolved.</p>	CLOSED	
Q-42	<p><b>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.</b></p>	<p>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.</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>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.</p>	<p>This clarification is being modified as discussed in Question 46 below.</p> <p>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.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided probably OK.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>		
Q-43	<p><b>Table 1 M 6. ANSI N45.2. 13 The requirements of the QAPM will be implemented instead of Section 3.4 this section.</b></p> <p>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.</p>	NRC place holder	CLOSED	
Q-44	<p><b>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.</b></p> <p>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</p>	<p>OK</p> <p>Change the wording to the following:</p> <p><b>Non-conformance notices for conditions described in this section</b> 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.</p>		YES

**Entergy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
	<p>conditions described in this section are only..." would remove any doubt. See L20.</p>	<p>8/27/98 meeting Discussed in the meeting issue resolved.</p> <p>10/7/98 meeting Issue discussed. Q-91 discusses whether or not this clarification is needed. If this clarification is kept as part of the resolution of Q-91 then the identified changes should be made if the issue is resolved.</p>		
Q-45	<p><b>Table 1 N.1. RG 1.144 Section C.3.a.(2) This section is not applicable.</b></p> <p>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</p>	<p>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.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-46	<p><b>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.</b></p> <p>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.</p>	<p>OK. But the procedures and documented part is covered by QAPM A.1.d.</p> <p>Modify the clarification to state:</p> <p>Instead of the annual documented evaluation of suppliers discussed in this section, <b>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.</b></p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	YES
Q-47	<p><b>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.</b></p> <p>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.</p>	<p>RBS USAR Section 1.8 page 204.</p> <p>8/27/98 Meeting Staff will consider the information provided probably OK.</p> <p>10/7/98 meeting Issue discussed and resolved.</p>	CLOSED	
Q-48	<p><b>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.</b></p>	<p>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</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	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.	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.  8/27/98 Meeting Staff will consider the information provided probably OK.  10/7/98 meeting Issue discussed and resolved.		
Q-49	<b>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.</b>  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.  8/27/98 Meeting Staff will consider the information provided probably OK.  10/7/98 meeting Issue discussed and resolved.	CLOSED	
Q-50	<b>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.</b>  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.  8/27/98 meeting Discussed in the meeting issue resolved.	CLOSED	
Q-51	<b>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</b>	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.	CLOSED	YES

Energy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>necessary if needed corrective actions are taken and verified prior to audit report issuance.</p> <p>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.</p>	<p>Change the exemption to the following:</p> <p>The QAPM Section A.6 corrective action program may be used instead of these requirements <b>as long as the appropriate time limits are applied to significant conditions adverse to quality.</b> Also, no additional documentation is necessary if needed corrective actions are taken and verified prior to audit report issuance.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>		
Q-52	<p><b>Table 1 O.2. ANSI N45.2.23 Instead of the requirements of this section, the following may be Section 2.3.4 implemented:</b>  <b>"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."</b></p> <p>The basic concept of demonstration of skills for lead auditors was previously approved by the NRC for SONGS. The following exception was found acceptable:</p> <p>"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."</p> <p>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</p>	<p>The documentation and procedure discussion in the SONGS SER is covered by QAPM A.1.d.</p> <p>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.</p> <p>I'll modify the clarification to discuss the one audit item from the SONGS SER.</p> <p>Prospective lead auditors shall demonstrate their ability to effectively implement the audit process and lead an audit team. <b>They shall have participated in at least one audit within the year preceding the individual's effective date of qualification.</b> Upon successful demonstration of the ability to effectively lead audits, licensee management may designate a prospective lead auditor as a lead auditor.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided.</p> <p><u>Post 8/27/98 meeting</u> In some places the SONGS clarification includes plant specific verbiage which is not appropriate for EOI</p>	CLOSED	YES

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>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 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.</p> <p><u>Post 8/27/98 meeting</u> Initial discussion with other QA members indicates a need to keep the exact wording of the previously approved exception at SONGS to ensure consistency with current positions. This wording should not change the intent of the EOI exception as discussed in the 08/27/98 meeting.</p>	<p>plants (e.g., "Nuclear Oversight audit" ). Concerning the additional statements in the SONGS clarification, as discussed above and in Q-77, the additional statements in the SONGS clarification are unnecessary.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>		
Q-53	<p>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 commitment. Examples include:</p> <ul style="list-style-type: none"> <li>- 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?</li> <li>- Section B.2.b.: What are the provisions to control design inputs, processes, outputs, changes, interfaces, records and organizational interfaces?</li> <li>- 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?</li> <li>- Section B.3.e.: Which are the individuals and groups responsible for design reviews or other verification activities? What are their authorities and responsibilities?</li> </ul>	<p>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 is consistent with the level of detail previously accepted on the specific item of interest for at least one of the Entergy plants.</p> <p>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.</p> <p>Specifically, what details have we removed from the plan that is required?</p> <p><u>8/27/98 Meeting</u> Staff is performing a review of the proposed QAPM. Staff will identify any specific issues as part of the review. Items will be addressed when identified.</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>- Section B.4.b.: What are the provisions for evaluating prospective suppliers and selecting qualified suppliers?</p> <p>- Section B.4.c.: What are the provisions for ensuring that qualified suppliers continue to provide acceptable products and services?</p> <p>Section B.5.a.: What are the provisions of the program to verify the quality of purchased items and services?</p> <p>These are examples of areas that require further amplifying discussions. There are many others in the various areas of the QAPM. All areas should be reviewed and expanded upon as appropriate.</p>			
Q-54	<p>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.)</p>	<p>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?</p> <p>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.</p> <p><u>8/27/98 Meeting</u> Staff will consider the information provided.</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		10/7/98 meeting Issue discussed and resolved.		
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.	<p>One way this is performed is by the QAPM requirement concerning the organizational level of the managers involved.</p> <p>For the QA manager's position additional information is contained in QAPM A.2.d.1 and A.4.b.</p> <p>What previously implemented acceptance criteria for the positions is missing.</p> <p>8/27/98 meeting Staff will consider the information provided.</p> <p>10/7/98 meeting Issue discussed and resolved.</p>	CLOSED	
Q-56	Section A.2.d (pp 8/9); no mention of QA responsibilities for these managers	<p>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."</p> <p>What specific responsibilities are not addressed?</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-57	Executive responsible for operations and nuclear safety appears to have no responsibility for QAP implementation	<p>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.</p> <p>8/27/98 Meeting A.2.c.1 and A.2.c.2 need to identify that these positions are responsible for implementing the QAPM.</p> <p>Post 8/27/98 meeting/8/27/98 meeting/27/98 meeting/27/98 meeting/27/98 meeting Modify A.2.c to the following:</p> <p>1. The executive responsible for overall plant nuclear safety at each site is responsible for establishing the</p>	CLOSED	YES



Energy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>policies, goals, and objectives <b>and the implementation</b> of the quality assurance program at the respective site and overseeing activities of the associated off-site safety review committee.</p> <p>2. The executive responsible for operations support is responsible for establishing <b>the</b> policies, goals, and objectives <b>and the implementation</b> of the quality assurance program of Entergy's corporate activities • and maintaining this QAPM in accordance with regulatory requirements.</p>		
Q-58	Is there a manager of maintenance?	<p>A.2.d.2</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-59	<p>QA functional responsibilities</p> <p>- If line organization personnel perform inspections, are personnel trained in QA technology?</p>	<p>Table 1 Item G provides Entergy's commitments to Regulatory Guide 1.58 "Qualifications of Nuclear Power Plant Inspection, Examination, and Testing Personnel."</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-60	<p>QA functional responsibilities</p> <p>- What is the extent of performance monitoring by the QA organization to assure proper QAPM implementation?</p>	<p>QAPM Section C provides a identification of the audit program. QAPM A.3.c requires an annual assessment of the QA program implementation.</p> <p>8/27/98 meeting QAPM A.6.e also requires trending of significant conditions adverse to quality.</p>	CLOSED	
Q-61	<p>QA functional responsibilities</p> <p>- 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:</p> <ul style="list-style-type: none"> <li>- audit and assessment results</li> <li>- open item status reports</li> <li>- NRC inspection reports</li> <li>- independent management assessments/audits</li> </ul>	<p>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.</p> <p>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.</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<p>- operating experiences</p> <p>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.</p>	<p>8/27/98 meeting</p> <p>Q-57 provides a change which resolves this issue.</p>		
Q-62	<p>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) ?</p>	<p>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 commitments.</p> <p>The current QA plans did not all provide the same level of detail in the discussion of the VP's function.</p> <p>8/27/98 meeting</p> <p>Q-57 provides a change which resolves this issue.</p>	CLOSED	
Q-63	<p>Previous commitments for implementation of QA functions not found in the QAPM:</p> <p>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."</p>	<p>QAPM B.12.a "Inspections are performed by qualified personnel other than those who performed or directly supervised the work being inspected."</p> <p>8/27/98 meeting</p> <p>QAPM A.1.b requires that all personnel are responsible for implementing the QAPM.</p>	CLOSED	
Q-64	<p>Previous commitments for implementation of QA functions not found in the QAPM:</p> <p>River Bend: Manager QA responsible for implementation of the QAPM (p. 12/13)</p>	<p>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."</p> <p>8/27/98 meeting</p> <p>QAPM A.1.b requires that all personnel are responsible for implementing the QAPM.</p>	CLOSED	
Q-65	<p>Previous commitments for implementation of QA functions not found in the QAPM:</p>	<p>QAPM A.2.d.1 "The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	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)	implementation and adequacy of the quality assurance program as described in this QAPM.  8/27/98 meeting QAPM A.1.b requires that all personnel are responsible for implementing the 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."  8/27/98 meeting QAPM A.1.b requires that all personnel are responsible for implementing the QAPM.  Post 8/27/98 meeting See Q-2, Q-88 and Q-89.	CLOSED	
Q-67	<u>Independent Review Program</u>  - 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 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.	See Q-11 for a discussion of the committee make-ups.  8/27/98 meeting Q-11 will track issues.	CLOSED	
Q-68	<u>Independent Review Program</u>  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.  8/27/98 meeting Licensee is committing to the Standard. Not a big	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-69	<p><u>Independent Review Program</u></p> <p>No commitment on PORC meeting frequency per Section 4.3.2.2 of ANSI N18.7 (per L4, will be in procedures).</p>	<p>issue.</p> <p>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.</p> <p><u>8/27/98 meeting</u> Licensee is commenting to the Standard. Not a big issue.</p>	CLOSED	
Q-70	<p><u>Independent Review Program</u></p> <p>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)</p>	<p>See Q-14. Section 4.3.4(4) was discussing violations that were reportable via a 24 hour report.</p> <p><u>8/27/98 meeting</u> Q-14 provides additional discussion. Licensee is commenting to the Standard.</p>	CLOSED	
Q-71	<p><u>Independent Review Program</u></p> <p>ANO</p> <ul style="list-style-type: none"> <li>- SRC has 8-12 members</li> <li>- Qualifications satisfy all technical areas</li> <li>- Meeting minutes within 14 days</li> <li>- Meeting once per calendar month</li> <li>- No exception to N18.7 §4.3.4(4)</li> </ul>	<p>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.</p> <p>For a discussion on Qualifications see Q-11.</p> <p>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.</p> <p>SRC meeting frequency 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.</p> <p><u>8/27/98 meeting</u> Licensee is commenting to the Standard.</p>	CLOSED	
Q-72	<p><u>Independent Review Program</u></p> <p>RBS</p> <p>- NRB is responsible for evaluating the scope, implementation and effectiveness of the QA program (QAD-1, REV-14C, p.18 of 23, top bullet); ANSI N18.7 (Section 4.3.4(5)) is cited as a replacement in the QAPM; but this section is <u>very</u> general. Table 1 should be more specific as to the subject matter to be addressed under this standard provision.</p> <p>- RBS takes no exceptions to ANSI N18.7 for the offsite independent review committee in the following areas [QAD-1, pp. (4), (5), &amp; (6)]:</p>	<p>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 the off-site committee. Section 4.5 and the associated clarification also require the off-site safety review committee to review the QA program every 6 months.</p> <p>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.</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	<ul style="list-style-type: none"> <li>- NRB has 9 to 13 members</li> <li>- Qualifications satisfy all technical areas</li> <li>Meeting minutes within 14 days</li> <li>- Records of NRB reviews to VP-Ops in 14 days</li> <li>- No exceptions to ANSI N18.7 §4.3.4(4)</li> </ul>	<p>For a discussion on Qualifications see Q-11.</p> <p>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.</p> <p>8/27/98 meeting Licensee is commenting to the Standard.</p>		
Q-73	<p><u>Independent Review Program</u></p> <p>RBS</p> <ul style="list-style-type: none"> <li>- RBS takes no exceptions to ANSI N18.7 for the onsite independent review committee in the following areas [QAD-1, pp. (1), (2), &amp; (3)]:</li> <li>- FRC has 6 to 11 members</li> <li>- Meeting frequency is at least once per month</li> <li>- 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.</li> </ul>	<p>For the number of members we are committing the ANSI N18.7 Section 4.3.2.1.</p> <p>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.</p> <p>8/27/98 meeting Licensee is commenting to the Standard.</p>	CLOSED	
Q-74	<p><u>Independent Review Program</u></p> <p>Waterford</p> <ul style="list-style-type: none"> <li>- Waterford takes no exceptions to ANSI N18.7 for the SRC.</li> <li>- SRC has at least five members</li> <li>- Qualifications of members meet ANSI/ANS3.1-1978, Section 4.7</li> <li>- Meet at least once per six months.</li> <li>- Meeting minutes within 14 days</li> <li>- Minimal exceptions taken to ANSI N18.7 in other areas.</li> <li>- Audit reports forwarded to affected management within 30 days.</li> </ul>	<p>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.</p> <p>We're committing to ANS3.1 1978 for all personnel (Table 1 A.1).</p> <p>We're committing to ANSI N18.7 Section 4.3.2.2 as a minimum meeting frequency (6 months).</p> <p>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.</p> <p>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.</p>	CLOSED	

**Entergy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
	<p>- 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.</p>	<p>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).</p> <p>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.</p> <p>8/27/98 meeting Licensee is commenting to the Standard.</p>		
Q-75	<p>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.</p>	<p>The QAPM requires this to be performed by the manager responsible for corrective action A.2.d.7 and A.6.e.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-76	<p>How are the responsibilities identified in para. 4.3.1.20 through 4.3.1.28 on p. 5 handled in the QAPM?</p>	<p>A.2.d.2 provides the necessary requirement.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-77	<p><u>Lead Auditor Qualifications</u></p> <p>- 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::</p> <p>"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."</p>	<p>See Q-52.</p> <p>8/27/98 meeting Staff feels that the discussion that 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 is needed.</p> <p>EOI discussed that QAPM A.1.d requires that all of the requirements of the QAPM be implemented by procedures addressed this item and that it was inconsistent to repeat it for only this item. These kind of statements were removed from the rest of the QAPM to remove the potential for confusion on those specific items where this statement was not included (if it is said on item A but not on item B does that mean procedures are not required for item B?).</p> <p>NRC and EOI to consider and discuss.</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		10/7/98 meeting Issue discussed and resolved.		
Q-78	<p><u>Auditing</u></p> <p>- 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?</p>	<p>QAPM C.2.a.1 allows the implementation of a performance based audit program as was previously approved for GGNS.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-79	<p>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 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?</p>	<p>Only RBS had this commitment QAPM A.3.c requires "The adequacy of the QAPM's implementation is assessed annually by the manager(s) responsible for quality assurance and reported to the chief executive officer and the associated executive for overall plant nuclear safety." The team makeup is a procedural detail that was removed from the QAPM.</p> <p>8/27/98 meeting Discussed in the meeting issue resolved.</p>	CLOSED	
Q-80	<p>RBS</p> <p>- 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.</p>	<p>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.</p> <p>8/27/98 meeting Licensee is commenting to the Standard.</p>	CLOSED	
Q-81	<p><u>Qualifications:</u></p> <p>- 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 <b>AND</b> appropriate experience, whereas the QAPM commitment requires a bachelor's degree <b>OR</b> certain levels of experience which appear to be rather minimal.</p> <p>- Waterford 3 meets the ANSI standard (see section 4.7.1.1 on p. 8).</p>	<p>See Q-6.</p> <p>8/27/98 meeting Discussed in the meeting. Issue Q-6 is addressing this issue.</p>	CLOSED	
Q-82	<p><u>QA Programs for Principal Contractors and Suppliers:</u></p> <p>- Waterford (Section 5.10.3, page 32) establishes controls for changes to the QA programs for principal contractors and suppliers and their</p>	<p>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.</p>	CLOSED	

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Number	Comment	Response	Closed?	Submit?
	subcontractors. The QAPM referenced sections do not explicitly identify such controls (A.3.a and A.3 b).	8/27/98 meeting Discussed in the meeting issue resolved.  10/7/98 meeting Issue discussed and it was identified that ANSI N18.7 section 5.2.13.1 discusses this issue. Issue resolved.		
Q-83	Is there a list of safety related SSCs in the site SARs? 8/27/98	Summary level lists. Engineering documents are what provide the component level information that feeds into the QAPM. A cross reference would not provide any additional clarity to the requirements.  10/7/98 meeting Issue discussed NRC would still like some kind of reference. EOI considering.		
Q-84	Per L34, EOI has elected to delete the requirement for an ISEG function from the QAPM because it is solely an outgrowth of the TMI Action Plan and has no tie in to the requirements of Appendix B. Further, not all plants are required to have an ISEG. However, it is noted that L34 makes a statement regarding the QAPM only, and does not address whether or not the ISEG function is maintained in the FSAR.	The intent was to relocate the ISEG requirements to the FSAR and the controls of 10CFR50.59 consistent with the controls approved for GGNS and RBS.  10/7/98 meeting Issue discussed and the Staff would still like some kind of controls on ISEG in the QA Plan. EOI and NRC to consider.		
Q-85	<u>INSPECTOR REPORTING:</u>  - Which organizational group in the QAPM is responsible for evaluating the qualifications of the inspection personnel and certifying them under N45.2.6?	See the resolution to Q-2.  10/7/98 meeting Issue discussed and resolved.	CLOSED	
Q-86	<u>INSPECTOR REPORTING:</u>  Waterford 3: Chapter 10 of the QAPM, section 3.2, page 109 says that inspectors are certified to N45.2.6 and are normally assigned to the line organization; however, during inspection activities, these personnel report to the QA inspections unit. The assigned inspector is not directly responsible for, or supervisor of, the activity being inspected.  NOTE: In Chapter 10 of the QAPM, Section 4.0, page 110, the inspection responsibility for each line management position is noted. The relocation of the inspection function to the various management positions in the EOI QAPM is also noted. However, in none of the position functional descriptions in the EOI QAPM is a responsibility for inspections identified.	Table 1 Item G commits the N45.2.6 for applicable inspectors.  Having personnel who are certified to N45.2.6 reporting to the QA manager during the activity is one acceptable method for providing the necessary independence. N18.7 provides an NRC endorsed level of independence that is also acceptable. Regardless see the resolution to Q-2.  See Q-2 new insert:  <b>B.12.g Additional details concerning inspections may be found in the Regulatory Guides and associated Standards as committed to in Section</b>	CLOSED	YES



Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	NOTE: Section B.12 of the EOI QAPM should include a subsection that references Section A.7 and Table 1 (e.g., Regulatory Guide 1.58). There appears to be no clear statement that inspectors are qualified to ANSI/ASME N45.2.6 in either Sections A.5 or B.12.	A.7 and Table 1 (e.g., Regulatory Guides 1.33 and 1.58). 10/7/98 meeting Issue discussed and resolved.		
Q-87	INSPECTOR REPORTING: River Bend: In QAD-10, section 6.5.1, page 6 of 9, specific criteria are established for the use of line organization personnel to perform inspection functions including:  - Operating activities may be inspected by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. When the inspector is from the same group as the individual performing the work, the activity to be inspected must be routine maintenance, normal plant operation or selected technical services; it may not include modifications or nonroutine maintenance. Also, the quality of the work can be demonstrated by a functional test when the activity involves breaching a pressure retaining boundary.  - Inspection procedures, training, qualification, and certification criteria for inspection personnel are reviewed and found acceptable by the Manager - Quality Assurance.  - The independence of the inspection personnel performing inspection of "in-line" functions is reviewed and found acceptable by the Manager - Quality Assurance prior to initiation of the inspection process.	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.  EOI is committing to ANSI N18.7. Methods of meeting these requirements are procedural details.  See the resolution to Q-2.  10/7/98 meeting issue discussed and resolved.	CLOSED	
Q-88	INSPECTOR REPORTING: Grand Gulf: - The VP, Operations Support and Director, Quality are responsible for assuring that work procedures include inspection requirements, and for assuring that inspections and examinations are performed and documented where necessary to assure quality (See OQAM, section 10.4.1 on page 51).  - The Director, Quality is responsible for developing and implementing procedures for the performance of all quality inspections. The coordination of activities concerning training and certification of all quality inspectors shall be accomplished by the Director, Quality (See OQAM section 10.4.2 on page 51/52).	See the resolution to Q-2.  Additionally add the following clarification to RG 1.58 (Table 1 item G)  <b>Certification of inspectors in accordance with this guide is approved by a manager responsible for quality assurance except for inspectors performing inspections as part of the procurement process. These inspectors may be approved by a manager responsible for materials, purchasing, and contracts.</b>  10/7/98 meeting	CLOSED	YES

**Energy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
	<p>The Director, Quality is responsible for assuring that inspection activities assigned to onsite contractors are accomplished in accordance with the OQAM (See OQAM section 10.4.3 on page 52).</p> <ul style="list-style-type: none"> <li>- Inspections shall be performed by qualified personnel who are independent of those who performed the activity being inspected. Inspection may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. When inspections are performed by individuals within the same group, the following controls shall be invoked:</li> <li>- the quality of the work can be demonstrated through a functional test when the activity involves breaching of pressure retaining items, and</li> <li>- the qualification criteria for inspection personnel are reviewed and found acceptable by Quality Programs prior to initiating the inspection.</li> </ul> <p>(See OQAM section 10.5.5 on page 53/54)</p>	<p>Issue discussed and resolved.</p>		
Q-89	<p><u>INSPECTOR REPORTING:</u> ANO:</p> <ul style="list-style-type: none"> <li>- "If individuals performing inspections are not part of the ANO organization, the inspection procedures, personnel qualification criteria, and independence from undue pressure such as cost and schedule are to be reviewed and found acceptable by the Director, Quality or designee <b>prior to initiation</b> of the activity." (See QAM, section 10.2.3.2 on page 10-3).</li> <li>- Quality Control personnel are involved in the establishment of inspection hold points for non-routine as well as other than non-routine activities. (See QAM, section 10.4.1 on page 10-4).</li> </ul>	<p>See the resolution to Q-88.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	
Q-90	<p><u>APPROVAL OF PROCEDURES:</u></p> <ul style="list-style-type: none"> <li>- QAPM section A.3.f indicates that the management responsible for the applicable quality function approves the procedures that implement the QAPM. What are the qualifications of the management personnel to perform QA procedure approval? L.11 indicates that the manager responsible for QA will be involved in audits of the QA procedures, practices, etc, but is not involved in approval at issuance as it was at GG but not at ANO and RBS.</li> </ul>	<p>Management personnel are qualified in accordance with Table 1 item A and the TS.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	

Energy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
Q-91	<p><u>CORRECTIVE ACTION:</u></p> <p>- In the W-3 QAPM section 5.3 page 144, a requirement for contractors to identify conditions adverse to quality is listed. Is this a requirement under the EOI QAPM? The referenced section is A.6.a which does not address the matter.</p>	<p>Table 1 item M commits to RG 1.123 with endorses N45.2.13. N45.2.13 Section 8 addresses nonconformances for purchased items.</p> <p>W-3 page 144 is discussing contractors who are performing work in accordance with the EOI QAPM. Those contractors will meet section A.6.</p> <p><u>10/7/98 meeting</u> Issue discussed EOI to consider and get back to the staff. The issue being reviewed is discussed in Q-104.</p>		
Q-92	<p><u>REGULATORY COMMITMENTS:</u></p> <p>- Table 1 of the QAPM should include a listing of the regulations to which the EOI QAPM will comply (See Item A.7.a., page 17.3-6 of the SRP).</p>	<p>Providing a listing of the regulations would not provide any additional clarity or requirements to the QAPM. The applicable regulations must be met unless there is an exemption.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	
Q-93	<p><u>REGULATORY COMMITMENTS:</u></p> <p>- Since extensive use is made of references to RGs and ANSI standards in lieu of more descriptive material in the QAPM to satisfy 50.34(b)(6)(ii), what commitment is made relative to the "shoulds" in the standards? If no exception/clarification is made, can it be assumed that the "shoulds" will be implemented?</p>	<p>N18.7 defines should as a recommendation.</p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	
Q-94	<p><u>REGULATORY COMMITMENTS:</u></p> <p>- In Section B.6 of the QAPM, there is no commitment regarding RGs and ANSI standards that are applicable to "Identification and Control of Items". Reference should be made to RG 1.33 and ANSI N18.7.</p>	<p>OK add the following information:</p> <p><b>B.6.c 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).</b></p> <p><u>10/7/98 meeting</u> Issue discussed and resolved.</p>	CLOSED	YES
Q-95	<p><u>ADDITIONAL ORGANIZATIONAL CONCERNS:</u></p> <p>- The manager responsible for QA should "Have no unrelated duties or responsibilities that would preclude full attention to assigned responsibilities" (See SRP 17.3, section A.2.d.(4), page 17.3-4). What assurance can be provided that this assignment of responsibility will not change without prior NRC review and approval in the light of</p>	<p>ANSI Standard N18.7 Section 3.4 in the last paragraph provides the NRC accepted guidance concerning other duties of the QA manager position. The NRC has previously accepted that the QA manager may have more than just traditional "QA" responsibilities. Items such as membership on on-site and off-site safety review committees, human performance, corrective</p>	CLOSED	

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
	QAPM section A.2.d which states that "These individuals ... may fulfill more than one function described below:"	action, assessments, and employee concerns are not "required" QA functions but they are functions that QA can perform. The applicable commitment for EOI is that the QA managers duties will "... be such that the required attention can be devoted as required..." If compliance with this statement was in bought into question then EOI would request a change in accordance with 10CFR50.54.  <u>10/7/98 meeting</u> Issue discussed and resolved.		
Q-96	<u>QUALIFICATION OF INSPECTION PERSONNEL:</u>  The applicability of RG 1.58 and ANSI N45.2.6. to inspection personnel is not clear. Specifically, A.5.d does not include RG 1.58 as an example, RG 1.58 is struck as a reference in section 6.6 of QAD-10, page 6 of 9 by A.1 (RBS), and item G.1 of Table 1 indicates that RG 1.58 may not apply if personnel qualifications are controlled by the Tech Specs or another QAPM commitment.	Table 1 provides the necessary commitment cross reference to this commitment is being added to QAPM B.12 as discussed in Q-86. The clarification is consistent with a current GGNS clarification.  <u>10/7/98 meeting</u> Issue discussed and resolved with the A.5.d changed to the following:  Additional details concerning Personnel Training and Qualification may be found in the Regulatory Guides and associated Standards as committed to in Section A.7 and Table 1 (e.g., Regulatory Guides 1.8, 1.58, and 1.146).	CLOSED	YES
Q-97	Section B.12 lacks a commitment to Table 1 regarding qualifications of inspection personnel.	Added as discussed in Q-86.  <u>10/7/98 meeting</u> Issue discussed and resolved.	CLOSED	
Q-98	<u>MEASURING AND TEST EQUIPMENT:</u>  - Section B.9.a of the QAPM states that the program for controlling measuring and test equipment does not include "permanently installed operating equipment or test equipment used for preliminary checks where data obtained will not be used to determine acceptability or be the basis for design or engineering evaluation". How will this equipment be controlled? (It is noted in RBS, QAD-12, page 3 of 6, section 6.4 that control of this equipment is addressed.)	Procedures control. Since the equipment will be used "for preliminary checks where data obtained will not be used to determine acceptability or be the basis for design or engineering evaluation" it is not M&TE this clarification is just pointing the fact out. It is consistent with the W3 requirements.  <u>10/7/98 meeting</u> Issue discussed and resolved.	CLOSED	
Q-99	<u>AUDITING:</u>  - What is the difference between assessing annually the adequacy of implementation of the QAPM (Section A.3.c), and auditing?	Level of detail of the review. An audit of all areas will be performed at least once every 2 years. The available information, including any audits performed, will be reviewed once per year. We can put them both	CLOSED	

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Number	Comment	Response	Closed?	Submit?
	performance of activities required by the QAPM to meet Appendix B at least once every two years (Section C.2.a.2.)?	on a 2 year schedule if that is preferred. A 2 year schedule for the overall assessment was approved for Pilgram.  <u>10/7/98 meeting</u> Issue discussed and resolved.		
Q-100	<u>TECHNICAL SPECIFICATIONS:</u>  - Need to review all the Tech Spec relocation information for RBS and GG. Transmittal letter indicates Tech Spec information for ANO and W-3 coming under separate cover letter. What's the status?	The items are included in the package.  e.g.,  Attachment 4 pages 85 through 89 and pages 112 through 114  Attachment 5 pages 21 through 26 and pages 73 and 74  <u>10/7/98 meeting</u> Issue discussed and resolved. W3 and ANO submittals are in the review process.	CLOSED	
Q-101	In section A.6.d of the QAPM, is the review of the disposition of non-conforming items performed on an "independent" basis? (See section 15.2.6., page 112 of the ANO QAM).	<u>10/7/98 meeting</u> Issue discussed and resolved.	CLOSED	
Q-102	For procedure reviews, exceptions are taken to ANSI N18.7, section 5.2.15 (See Table 1, section C, RG 1.33, items 22 and 23) regarding the reasons for and frequency of procedure reviews. Instead of the provisions of the ANSI standard, QAPM section A.6 (Corrective Action) will be followed. Section A.6 does not address procedure reviews per se although their review as a result of a condition adverse to quality is implied. It does not address use of procedures that have been dormant for some time, nor does it address procedure reviews related to plant modifications – none of which is related to corrective action. Please clarify. What has been the licensees' experience regarding the need for procedure reviews over the years?  NRC position on review of procedures is as follows:  - applicable plant procedures shall be reviewed following an unusual event or modification to a system (See ANSI N18.7, section 5.2.15),  - non-routine procedures shall be reviewed at least every two years,  - QA shall review a representative sample of routine procedures at least every two years, and	<u>10/7/98 meeting</u> As discussed in Discussion of Change L.7, the procedure periodic review requirements at the sites are made consistent. Each of the sites has a different description of the procedure periodic review requirements in the current quality assurance programs. The proposed QAPM has procedure periodic review requirements which are based on those previously approved for ANO.  Issue discussed and resolved.	CLOSED	

**Energy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
Q-103	<p>- routine procedures not used for two years shall be reviewed prior to use.</p> <p>- ANO: procedures are reviewed for possible revision upon identification of new or revised source material (See QAMO, Table 1, p. 138).</p> <p>What organization implements the QA functions for the procurement activity?</p> <ul style="list-style-type: none"> <li>- evaluation of suppliers' QA programs</li> <li>- verification of supplier activities to assure conformance to QA requirements,</li> <li>- evaluation of suppliers conformances,</li> <li>- receipt inspection to determine supplier conformance to PO requirements.</li> </ul>	<p><u>10/7/98 meeting</u>                      The manager responsible for materials, purchasing, and contracts is responsible for supplier evaluations, source verifications, procurement, services, receipt, storage, and issue of materials, parts, and components. Transfer of the responsibility from the executive responsible for operations support to manager responsible for materials, purchasing, and contracts is in L.5. Q-2 is tracking aspects associated with this issue.</p> <p>Issue discussed and resolved.</p>	CLOSED	
Q-104	<p>For RG 1.123 and ANSI N45.2.13 Section 8.2 (Table 1, M., item 8), the clarification indicates that supplier non-conformances need only be reported to the purchaser when they affect safety (and several other factors). How does a supplier know whether a non-conformance affects safety or not? Should not this determination be made by the licensee?</p> <p>- ANO requires all such information to be submitted to the licensee for its determination (See QAMO, section 15.3.1, p.112).</p>	<p><u>10/7/98 meeting</u>                      This change is based on a GGNS clarification. Q-91 is tracking aspects associated with this issue.</p> <p>Issue discussed and resolved.</p>	CLOSED	
Q-105	<p>There are extensive controls for the Fire Protection program described in the ANO QAMO, Appendix B, page 175. Per L.27, these controls have not been translated to the QAPM and reference is made to Section A.1.c. of the QAPM. It is not clear that the latter reference resolves the deletion. Please explain.</p>	<p><u>10/7/98 meeting</u>                      The fire protection QA requirements were removed from the ANO QAP because they are not associated with 10 CFR 50 Appendix B requirements.</p> <p>Discussions identified 2 issues.</p> <ol style="list-style-type: none"> <li>1. A desire on the Staff's part that the bulk of these ANO fire protection QA details go into a "referencable document (i.e., the SAR).</li> <li>2. That the fire protection 1, 2, and 3 year audits remain in the QAPM.</li> </ol>		YES

**Entergy QAPM review matrix**

Number	Comment	Response	Closed?	Submit?
		<p>EOI said that they would consider the changes and the Staff said that they would consider whether their concerns are valid.</p> <p>Post 10/7/98 meeting EOI will modify the QAPM to include the audits change C.2.a.2 as follows:</p> <p>Audit schedules assure that the following areas are audited at <b>the indicated frequencies</b>, or more frequently as performance dictates.</p> <p>a. The conformance of each unit's operation to provisions contained within the Technical Specifications and applicable license conditions is audited <b>at least once every 24 months</b>.</p> <p>b. The performance, training, and qualifications of the entire staff is audited <b>at least once every 24 months</b>.</p> <p>c. The results of actions taken to correct deficiencies occurring in unit equipment, structure, systems, or method of operation that affect nuclear safety is audited <b>at least once every 24 months</b>.</p> <p>d. The performance of activities required by the QAPM to meet the criteria of 10 CFR 50, Appendix B is audited <b>at least once every 24 months</b>.</p> <p>e. The Offsite Dose Calculations Manual and Process Control Program and implementing procedures is audited <b>at least once every 24 months</b>.</p> <p>f. The radiological environmental monitoring program and the results thereof is audited <b>at least once every 24 months</b>.</p> <p>g. The fire protection program and implementing procedures <b>at least once 12 months</b>.</p> <p>h. A fire protection and loss prevention program inspection and audit shall be performed using either off-site licensee personnel or an outside fire</p>		

Entergy QAPM review matrix				
Number	Comment	Response	Closed?	Submit?
		<p>protection firm at least once 24 months.</p> <p>i. A fire protection and loss prevention program inspection and audit shall be performed using an outside fire consultant at least once 36 months.</p>		