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November 13, 1998

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Operational Quality Assurance Manual (OQAM), Revision 16

GNRO-98/00094

Gentlemen:

Entergy Operations, Inc. is submitting in accordance with 10CFR50.54(a)(3), the Grand Gulf Nuclear Station Operational Quality Assurance Manual (OQAM), Topical Report GGNS-TOP-1A, Revision 16.

The changes reflect various organizational changes. Evaluation per 10CFR50.54 determined that no reduction of commitments to previously accepted Quality Program description (OQAM, Revision 15) resulted from this change.

Revision 16 of the OQAM continues to satisfy the requirements of 10CFR50 Appendix B and the Regulatory Guides and ANSI Standards referenced in Appendix A of the OQAM. OQAM change specifics and basis for this conclusion as required by 10CFR50.54(a)(3)(ii) is delineated in Attachment A.

As required by 10CFR50.71, I hereby certify to the best of my knowledge, information, and belief, that the information provided herein accurately reflects changes made since OQAM, Revision 15.

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Should you have any questions, please contact Mr. Gary W. Ingram at (601) 437-6716.

Yours truly,

William A. Safe.

WKH/RSJ/ams

attachments:

A. 10CFR50.54 Commitment Verification

B. Operational Quality Assurance Manual (OQAM), Revision 16

cc:

Ms. J. L. Dixon-Herrity, GGNS Senior Resident (w/a)

Mr. L. J. Smith (Wise Carter) (w/a)

Mr. N. S. Reynolds (w/a)

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Attachment A

10CFR50.54 COMMITMENT VERIFICATION

10CFR50.54(a)(3) CHANGE REVIEW #98-0005

PROPOSED CHANGE: Revision 16 update to the Operational Quality Assurance Manual (OQAM). See Attachment A for individual change descriptions.

(Additional pages may be attached as required)

10CFR50.54 REVIEW:

1. Does the proposed change represent a reduction of commitments to the QA Program description previously accepted by the NRC?

Yes ☐ No ☒ Explain: See Attachment A for individual change justification.

2. If item 1 above is Yes, does the proposed change include the basis to conclude that the revised incorporating the change continues to meet the criteria of 10CFR50, Appendix B and other previously accepted UFSAR commitments?

Yes ☐ No ☒ N/A Explain: See Attachment A for individual change justification.

Reviewed By: A. W. Anglin 10-29-98
Quality Reviewer Date

RECOMMENDATION:

☒ Does not represent a reduction in commitments. Can be implemented.

____ Represents a reduction in commitments, however the change has sufficient basis to demonstrate continued compliance with Appendix B and other UFSAR commitments. Therefore, it should be submitted to the NRC for the acceptance prior to implementation.

____ Represents a reduction in commitments with insufficient basis to determine continued compliance. Therefore, the change cannot be processed.

Recommended By: R. Whaley 10-29-98
Supervisor, QP Reviews Date

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|--------------------|
| QA RECORD |
| RT |
| INITIALS |
| Number of Pages |
| DATE |
| Related Documents# |

DISPOSITION:

- ____ Disapproved
____ Approved for implementation
☒ Approved for submittal to the NRC for acceptance

Approved By: J. R. Pitt 10/30/98
Director, Quality Date

10CFR50.54 COMMITMENT VERIFICATION FOR OQAM REVISION 16

Action 1 - Delete "Manager" and add "Director".

Section - 1.3.2, Second sentence.

Justification - This change is administrative in nature. It involves only a management title change. The title of Manager, Nuclear Training, is changed to Director, Nuclear Training. There is no change in responsibility, organizational reporting, management qualification requirements, or the training program. There is no reduction of commitments.

Action 2 - Add "and Modifications", delete "& Work Control", add "Manager, Planning & Scheduling", and delete "and Plant Security".

Section - 1.3.5, second paragraph, first sentence.

Justification - This change involves only management title changes and organizational reporting. The title of the Manager, Plant Maintenance, is changed to Manager, Plant Maintenance and Modifications. The title of the Manager, Outage Management & Work Control, is changed to Manager, Outage Management. The new position of Manager, Planning & Scheduling, reports to the General Manager, Plant Operations, and is responsible for planning and scheduling activities previously assigned to the Manager, Outage Management & Work Control. The Security Superintendent who previously reported to the General Manager, Plant Operations, now reports to the Director, Plant Projects & Support. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 3 - Delete "and Fire Protection,".

Section - 1.3.7, third sentence.

Justification - This change reassigns the responsibility for providing technical assistance in the area of fire protection from Nuclear Safety & Regulatory Affairs to the Design Engineering Organization. This is consistent with UFSAR Sections 9.B.2.1.3 and 13.1.1.1.1.6.1.2 for fire protection and organizational responsibility. There is no change in qualification requirements or function performance. There is no reduction of commitments.

Action 4 - Add "Manager, Engineering Programs;" delete "and", and add ", and engineering programs-including fire protection".

Section - 1.3.8, second sentence.

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Justification - This change affects only organizational reporting. The new position of Manager, Engineering Programs, reports to the Director, Design Engineering - GGNS, and is responsible for various engineering programs and for providing technical assistance in the area of fire protection. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 5 - Delete "Plant Projects & Support" and add "Nuclear Training".

Section - 1.3.23, first sentence.

Justification - This change affects only organizational reporting. The Manager, Emergency Preparedness, who previously reported to the Director, Plant Projects & Support, now reports to the Director, Nuclear Training. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 6 - Delete section.

Section - 1.3.25.

Justification - This change affects only organizational reporting. The position of Manager, Project Management, is discontinued. Project management activities which were the responsibility of the Manager, Project Management, are assumed by the Manager, Mechanical/Civil Engineering, reporting to the Director, Design Engineering - GGNS. Change Review Board (CRB) oversight which was the responsibility of the Manager, Project Management, is assumed by the Director, Plant Projects & Support. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction in commitments.

Action 7 - a. Delete "& Work Control".

- b. Delete ", Scheduling, and implementing design changes and plant modifications. He is also responsible for the implementation of assigned major maintenance, outage scheduling, and daily scheduling." and add "and scheduling outage activities."

Section - 1.3.26, title, first and last sentences, and second sentence, respectively.

Justification - This change is administrative in nature. It involves a management title change and the reassignment of responsibility for design changes and plant modifications and for major maintenance and daily scheduling. The title of Manager, Outage Management & Work Control, is changed to Manager, Outage Management. Responsibility for design changes and plant modifications and for major maintenance is reassigned to the Manager, Plant Maintenance and Modifications,

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reporting to the General Manager, Plant Operations. Responsibility for daily scheduling is reassigned to the Manager, Planning & Scheduling, reporting to the General Manager, Plant Operations. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

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- Action 8 -
- a. Delete "managing implementation of major special projects and programs;" and "emergency preparedness" and add "security program activities".
 - b. Add "He" and "He has oversight responsibility for the Change Review Board (CRB)."
 - c. Delete "and the Manager, Project Management".

Section - 1.3.33. first sentence, between first and second sentences, and third sentence, respectively.

Justification - This change is administrative in nature and affects only organizational reporting. It involves the reassignment of responsibility for project management, emergency preparedness program activities, security program activities, and Change Review Board (CRB) oversight. Responsibility for project management is reassigned from the discontinued position of Manager, Project Management, reporting to the Director, Plant Projects & Support, to the Manager, Mechanical/Civil Engineering, reporting to the Director, Design Engineering-GGNS. Responsibility for emergency preparedness program activities is reassigned from the Director, Plant Projects & Support, to the Director, Nuclear Training. Responsibility for security program activities is reassigned from the General Manager, Plant Operations, to the Director, Plant Projects & Support. Responsibility for Change Review Board (CRB) oversight is reassigned from the discontinued position of Manager, Project Management, to the Director, Plant Projects & Support. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 9 - Add "He is also responsible for managing the design and implementation of various major design projects."

Section - 1.3.42, between second and last sentences.

Justification - This change is administrative in nature and affects only organizational reporting. It involves the reassignment of responsibility for project management from the discontinued position of Manager, Project Management, reporting to the Director, Plant Projects & Support, to the Manager, Mechanical/Civil Engineering, reporting to the Director, Design Engineering-GGNS. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

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Action 10 - Delete "fire protection engineering,".

Section - 1.3.43, first sentence.

Justification - This change is administrative in nature and affects only organizational reporting. The responsibility for fire protection engineering is reassigned from the Manager, Electrical/I&C Engineering, to the new position of Manager, Engineering Programs, reporting to the Director, Design Engineering-GGNS. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 11 - a. Add "MANAGER, ENGINEERING PROGRAMS" Block under "DIRECTOR, DESIGN ENGINEERING-GGNS" Block.

b. Change "BY" to "BUT" in OFFSITE/ONSITE footnote.

c. Change "MANAGER" to "DIRECTOR" in "MANAGER, NUCLEAR TRAINING" Block.

d. Delete "MANAGER, PROJECT MANAGEMENT" Block.

e. Change organizational reporting line of "MANAGER, EMERGENCY PREPAREDNESS" from "DIRECTOR, PLANT PROJECTS & SUPPORT" Block to "DIRECTOR, NUCLEAR TRAINING" Block.

f. Add "MANAGER, PLANNING & SCHEDULING" Block under "GENERAL MANAGER, PLANT OPERATIONS" Block,

g. Delete "& WORK CONTROL" in "MANAGER, OUTAGE MANAGEMENT & WORK CONTROL" Block.

h. Add "& MODIFICATIONS" to "MANAGER, PLANT MAINTENANCE" Block.

Section - Policy 1 organization chart, page 14 of 14.

Justification - These changes reflect organization chart changes per Actions 1, 2, 4, 5, 6, and 7 above. There is no reduction of commitments.

Action 12 - Delete "Outage Management & Work Control" and add "Plant Maintenance and Modifications".

Section - 3.4.1, second sentence; 4.4.10, first sentence; 5.4.3, second sentence; 9.4.1, second sentence; 10.4.1, second and fourth sentences; 12.4.1, second sentence; 13.4.1, second sentence; and 16.4.2, second paragraph.

Justification - This change is administrative in nature. It involves a management title change and the reassignment of responsibility for design modifications or change activities. The title of Manager, Plant Maintenance, is changed to Manager, Plant Maintenance and Modifications.

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Responsibility for design modifications or change activities is reassigned from the Manager, Outage Management & Work Control, to the Manager, Plant Maintenance and Modifications. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 13 - Delete " & Work Control is" and add ", Manager, Planning & Scheduling, and Manager, Plant Maintenance and Modifications, are".

Section - 3.4.2, fifth sentence.

Justification - This change is administrative in nature. It involves a management title change and the reassignment of responsibility for plant modifications, betterments and repairs. The title of Manager, Outage Management & Work Control, is changed to Manager, Outage Management. The Manager, Plant Maintenance and Modifications, Manager, Planning & Scheduling, and Manager, Outage Management, are assigned responsibility for various aspects of plant modifications, betterments and repairs. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 14 - Delete "General Manager, Plant Operations" and add "Director, Design Engineering-GGNS".

Section - 9.4.1, first and second sentence.

Justification - This change is administrative in nature. It involves the reassignment of responsibility for special processes from the General Manager, Plant Operations, to the Director, Design Engineering-GGNS. Neither the performance of any function nor the training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

- Action 15 -
- a. Add "and Director, Design Engineering-GGNS".
 - b. Delete "The General Manager, Plant Operations is" and add, "They are".
 - c. Delete "He is" and add, "They are".

Section - 11.4.1, first, second, third and fourth sentences, respectively

Justification - This change is administrative in nature and is due to the creation of the new management position of Manager, Engineering Programs, reporting to the Director, Design Engineering-GGNS. It involves the reassignment of responsibility for test control activities. The General Manager, Plant Operations and the Director, Design Engineering-GGNS are assigned responsibility for various aspects of test control. Neither the performance of any function nor the

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training and qualification of personnel performing any function as described in the OQAM is affected. There is no reduction of commitments.

Action 16 - Delete "prior to installation or never declared operable" and add "before receipt inspection acceptance".

Section - 15.1, second paragraph.

Justification - This change redefines discrepant material. It is intended to facilitate the clarification of the division of responsibility between the Director, Quality, and the Vice President, Operations Support, for the processing and control of material deficiencies. Discrepant material is the responsibility of the Vice President, Operations Support, and is not processed and controlled as part of the Condition Report (CR) Process. Material nonconformances discovered after receipt inspection acceptance are processed and controlled as part of the CR Process, which is owned by the Director, Quality, and continues to comply with OQAM requirements. The change only facilitates deficient material responsibilities clarification. There is no reduction of commitments.

Action 17 - Delete "Nuclear Plant" and add "Design" and "-GGNS".

Section - Appendix C, Item C.

Justification - This change corrects a typographical error. The name of the Design Engineering Department was changed from Nuclear Plant Engineering to Design Engineering-GGNS in Revision 14 of the OQAM. This change was inadvertently not included as part of the Revision 14 submittal. There is no reduction of commitments.
