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Michael A. Krupa
Director
Nuclear Safety & Licensing

October 11, 2001

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Stop OP1-17
Washington, DC 20555-0001

Subject: Entergy Operations, Inc.
Proposed Revision to the Quality Assurance Program Manual

Arkansas Nuclear One
Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

River Bend Station
Docket No. 50-458
License No. NPF-47

Waterford 3 Steam Electric Station
Docket No. 50-382
License No. NPF-38

CNRO-2001-00035

In accordance with 10 CFR 50.54(a)(4), Entergy Operations, Inc. (Entergy) requests NRC approval of a proposed change to our Quality Assurance Program Manual (QAPM). The proposed change is presented in Attachment 1 with an accompanying marked-up page in Attachment 2. Entergy has determined that the proposed change represents a reduction in commitment, thereby requiring NRC approval.

In accordance with 10CFR50.54(a)(4)(iv), this change to the QAPM description shall be regarded as accepted by the Commission upon receipt of a letter to that effect or 60 days after submittal of this request, whichever occurs first.

If there are any questions regarding this request, please contact Rick Thomas at 601-368-5747.

Sincerely,

MAK/RLT/baa

attachments: 1. Proposed Revision
2. Marked up page indicating all changed material\

cc: (See Next Page)

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cc: Mr. C. G. Anderson (ANO)
Mr. W. A. Eaton (GGNS)
Mr. R. J. Edington (RBS)
Mr. J. T. Herron (W3)
Mr. G. J. Taylor (ECH)

Mr. T. W. Alexion, NRC Project Manager (ANO-2)
Mr. P. J. Alter, NRC Senior Resident Inspector (RBS)
Mr. R. L. Bywater, NRC Senior Resident Inspector (ANO)
Mr. T. R. Farnholtz, NRC Senior Resident Inspector (W3)
Mr. T. L. Hoeg, NRC Senior Resident Inspector (GGNS)
Mr. N. Kalyanam, NRC Project Manager (W3)
Mr. E. W. Merschoff, NRC Region IV Regional Administrator
Mr. R. E. Moody, NRC Project Manager (RBS)
Mr. S. P. Sekerak, NRC Project Manager (GGNS)

PROPOSED CHANGE TO THE ENTERGY QUALITY ASSURANCE PROGRAM MANUAL

I. Current Requirement

QAPM Table 1, Section C.9 lists a specific Clarification/Exception to ANSI N18.7 Section 4.3.4, "Subjects Requiring Independent Review." Section C.9 states:

"Examples of the matters reviewed by the on-site safety review committee in accordance with this section are the following:

- a. new and revised station administrative procedures and
- b. changes to the Emergency Plan (except editorial changes)."

II. Proposed Change

Entergy Operations, Inc. proposes to delete Clarification/Exception Section C.9.a of QAPM Table 1, thereby allowing the onsite review committee the flexibility to determine which procedures the committee should review based on the procedure's importance and impact to nuclear safety.

III. Justification of Proposed Change

ANSI N18.7, Section 4.3.4 provides a specific requirement for the independent review of proposed changes in procedures that involve changes in technical specifications or an unreviewed safety question. Section 4.3.4(5) provides for the review of any other matter involving safe operation of the nuclear power plant, which an independent reviewer deems appropriate for consideration.

The requirements in Section 4.3.4 are appropriate as written for determining which procedures need on-site safety review committee review and are not enhanced by having an additional requirement for the review of a specific type of procedure (as Section C.9.a requires). In other words, deleting the Clarification/Exception allows the onsite safety review committee to make procedure review determinations based upon the procedure's importance and nuclear safety impact rather than just having the procedure's classification as "administrative."



QUALITY ASSURANCE PROGRAM MANUAL

Table 1
Regulatory Commitments

C. Regulatory Guide 1.33 (continued)

	Clarification/Exception
7. ANSI N18.7 Section 4.3.4(3)	Revision to proposed Technical Specification changes only require review in accordance with this section when the revision involves a significant change to the technical basis for the proposed change.
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.
9. ANSI N18.7 Section 4.3.4(5)	An eExamples of the matters reviewed by the on-site safety review committee in accordance with this section are the following: is a a. new and revised station administrative procedures and b. changes to the Emergency Plan (except editorial changes).
10. ANSI N18.7 Section 4.5	This section establishes minimum 2 year audit frequency for all safety related functions. Entergy will perform audits at frequencies as discussed in QAPM Section C.2.a instead of this section.
11. ANSI N18.7 Section 4.5	The independent review body discussed in this section is the off-site safety review committee.
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.
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.