

# **ENTERGY's Common Quality Assurance Program Manual**

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**September 19, 2001**



# Purpose of Meeting

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- **To present our intent to adopt a common QAPM for ENG C and ENOI plants**
- **To review the benefits of adopting this common QAPM**
- **To inform and discuss with you our development strategy, review methodology, assessment of commitments and our implementation plan**
- **To inform you that based on our activities to date, the submittal of the proposed common QAPM does not appear to require prior NRC approval.**



# History

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- **Entergy Operations, Inc. (EOI) formed June, 1990**
  - **ANO Units 1 & 2**
  - **GGNS**
  - **WF3**
  - **RBS (1994 merger with Gulf States Utilities)**
- **Four QA Manuals + Headquarters Policy**
- **Merged into a single QAPM based on SRP 17.3**
- **EOI received NRC SER in November, 1998**



# History (cont'd)

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- **Entergy Nuclear Generating Company (ENGCG) formed in 1999**
  - **PNPS**
- **Entergy Nuclear Operations, Inc. (ENOI) formed in 2000**
  - **IP3**
  - **JAF**
- **ENTERGY (EOI, ENGCG, ENOI) again has Four QAPMs**
  - **IP2 to be evaluated and integrated at a later date**



# **Benefits**

## **“Why Adopt the EOI QAPM?”**

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- **Program already approved by NRC and being implemented at 5 EOI plants.**
- **Program has been implemented since 1998 and has been audited for effectiveness.**
- **Implementing procedures already exist to support the EOI Common QAPM and are available for ENGC/ENOI use.**



## **Benefits**

### **“Why Adopt the EOI QAPM?” (cont’d)**

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- ⦿ **Updates a number of earlier commitments to Regulatory Guides and ANSI Standards.**
- ⦿ **Provides a fleetwide focus to all ENTERGY Plants and allows us to adopt best practices without QAPM restrictions.**

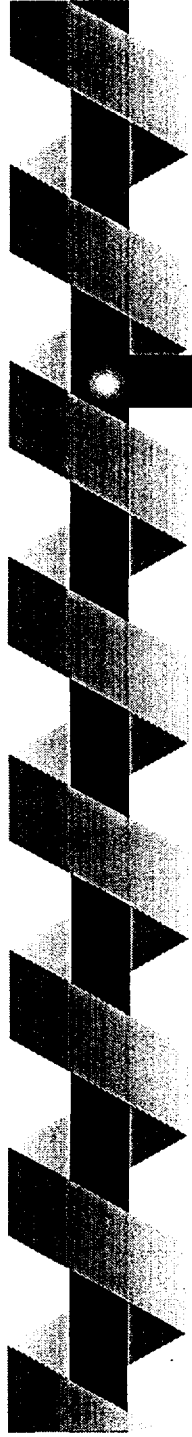


## **Benefits**

### **“Why Adopt the EOI QAPM?” (cont’d)**

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- **A common ENTERGY QA Manual will drive a common approach toward implementation. This will allow an improvement originating in one plant to be shared as applicable with all plants.**
- **A consolidated QA manual promotes consistent understanding, implementation, administration and oversight of the QA program.**



## **Benefits**

### **“Why Adopt the EOI QAPM?” (cont’d)**

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- **Common QA Program training for personnel fleetwide. Common understanding of QA program and implementing procedures enhances the effectiveness of resource sharing.**





# **Common QAPM Development Strategy**

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- **ENGCC/ENOI are adopting the EOI Common QAPM, not creating a new QAPM. We are adding three (3) plants.**
- **Established QA Peer Working Group from 3 plants and corporate to ensure consistency and standardization.**
- **Utilizing the same evaluation process on plant specific QAPM's as was utilized by EOI.**



# **Common QAPM Development Strategy (cont'd)**

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- **Utilizing direct final rule making per 10 CFR 50.54(a)(3).**
- **Utilizing the NRC SER for approval of EOI and FENOC Common QAPM.**



# **Review Methodology**

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- **Comparing EOI Common QAPM to each existing program (IP3, JAF, PNPS).**
- **Utilizing 10CFR50.54(a)(3), Direct Final Rulemaking.**
- **Interfacing with former EOI common QAPM Licensing Lead.**
- **Utilizing NRC SER for approval of EOI and FENOC QAPM.**



# **Review Methodology (cont'd)**

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- **Reviewing EOI resolution of NRC requests for additional information for understanding of how issues were resolved.**
- **Utilizing the same assessment process for existing QAPM resolution as EOI (revised for direct final rulemaking).**



# **Review Methodology (cont'd)**

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- **Performed a line by line review of existing QAPMs against EOI common QAPM. We looked to determine:**
  - **Acceptable under Direct Final Rulemaking**
  - **Requires change to EOI QAPM to eliminate**
  - **Requires prior NRC approval**
- **Developed a list of more restrictive commitments. (Needs to be addressed before implementing new manual).**



# **Review Methodology (cont'd)**

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- **Identified where to relocate Reg. Guides and ANSI standards that will not remain in the manual.**
- **Developed a Common QAPM implementation plan.**
  - **Present intention is to implement the common QAPM by the end of 1st QTR 2002**
  - **A phased in approach may be necessary based on each site's resource commitments.**

# ENGCE/ENOI Common QAPM Assessments

- **An INDEPENDENT ASSESSMENT led by EOI will be performed to ensure that the ENGCE/ENOI efforts in adopting the EOI Common QAPM do not result in missing any reduction in commitment requiring prior NRC approval under 10CFR50.54(a)(3).**

**Schedule: End of October, 2001**



# **ENGCC/ENOI Common QAPM Assessments (cont'd)**

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- **A READINESS ASSESSEMENT led by ENOI Corporate QA will be performed to ensure that all more restrictive changes and reduction in commitments have been resolved. Also, the effectiveness of the implementation plan will be assessed.**

**Schedule: 6 weeks prior to implementation date**





# **ENGC/ENOI Common QAPM Assessments (cont'd)**

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- **A COMMON QAPM EFFECTIVENESS AUDIT led by the site QA organizations will be performed to determine how completely and effectively the new Common QAPM has been implemented.**

**Schedule: 3 months after date of implementation**



# **ENTERGY's Common Quality Assurance Program Manual**

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- **Summary Discussion**

- **Return and Review Meeting Purpose**

- **Questions and Answers**

- **Any additional questions**