



**ENTERGY**

Entergy Operations, Inc.

P.O. Box 756

Port Gibson, MS 39150

Tel 601 437 6470

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

M. J. Meisner

Director

Nuclear Safety & Regulatory Affairs

November 9, 1994

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416, License No. NPF-29  
Graded QA Initiative

GNRO-94/00132

Dear Mr. Milhoan:

In your October 14, 1994 letter to the Nuclear Energy Institute (NEI) concerning the graded QA initiative, you express concern that one plant considered the reactor protection system (RPS) to be "low-risk significant", as this term is defined by the NRC for graded QA. In discussions with NEI and your staff, we were surprised to find that you were referring to Grand Gulf.

Normally, we would correct a mistake of this nature with a phone call. In this case, however, we thought it worthwhile to write to you because such mistakes have recurred and, in our opinion, seem characteristic of a lack of appreciation of the technical basis which underlies the graded QA initiative at Grand Gulf.

In simple terms, there are two distinct tasks in graded QA: 1) determining the importance of SSCs, and 2) applying quality controls to SSCs based upon that importance. In conjunction with an EPRI project Grand Gulf has focused its attention over the last two years on developing an approach and methodology which can be applied to the first of these tasks.

Last Spring, we provided a detailed briefing to your staff on the technical details necessary to determine SSC safety importance (a combined deterministic and probabilistic approach). With respect to the RPS, we explicitly informed the staff that it had been placed in our "safety-significant" category (or, "high risk significant" category, in the NRC's terminology)<sup>1</sup> for the very reason you raised - the increased potential for common mode failure should the level of quality assurance be reduced. We were discouraged to find that despite these briefings and written handouts, the staff informed you to the contrary. In retrospect, we should not have been surprised because the focus and interest of the staff in our Spring, 1994 meeting appeared to be restricted to determining the level of QA control to be applied to non-safety significant components, rather than the technical approach to determining safety significance.

<sup>1</sup>The NRC's use of the term high or low "risk significance" in graded QA can be quite misleading. Both the RPS and the SLCS (discussed later) are properly termed "low risk significant" systems because they contribute little to plant risk in the Grand Gulf IPE. We confuse matters, however, when we use risk-based terminology to encompass deterministic insights. For purposes of graded QA, both the RPS and SLCS are "high risk significant" systems - contradictory to the PRA terminology. What we really mean is that the RPS and SLCS are important to safety. They are important to safety, not from a risk perspective, but from a deterministic judgment by plant experts. Consequently, a more appropriate terminology is high or low "safety significance". (This confusion factor is more than just academic semantics. As an example, Bill Russell visited Grand Gulf in August. Early in the visit he asked a shift supervisor what was the most risk-significant system at Grand Gulf. The supervisor's response was the reactor protection system (because of its deterministic importance). Mr. Russell properly took us to task for not having sufficiently educated our personnel on the insights from our IPE. Using the NRC's favored graded QA terminology in this circumstance would have hopelessly confused the issue.)

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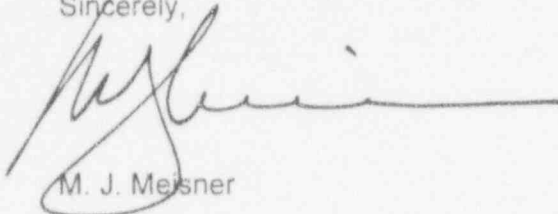
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Similarly, in a July 21, 1994 Senior Management Steering Committee meeting on graded QA the staff claimed that Grand Gulf had categorized the standby liquid control system (SLCS) as "low risk significance". As with the RPS, our graded QA program had categorized the SLCS as "safety significant" based on the deterministic insights of our expert panel. This conclusion was also shared with the staff when they visited last Spring.

Overall, we have been concerned with the level of the staff's technical understanding associated with the initial graded QA task - i.e., determining the importance of SSCs. We have also noted misunderstandings of technical concepts beyond the mis-classified systems discussed above.

In our view, part of the difficulty in reaching agreement between the industry and NRC on graded QA initiatives has to do with a "cart before the horse" approach. The staff's primary attention has been on the QA controls to be applied to "low risk significant" components, rather than how we determine which SSCs are important. We believe that until the industry and staff understand and agree on the technical basis for determining which components are important to safety, we will continue to look with suspicion on any attempt to reduce the level of quality assurance for the less important components.

Sincerely,

A handwritten signature in dark ink, appearing to read 'M. J. Meisner', with a long horizontal flourish extending to the right.

M. J. Meisner

MJM/be

cc: see next page

cc:

Ms. S. C. Black (NRC)  
Mr. A. Heymer (NEI)  
Mr. H. W. Keiser  
Mr. R. B. McGehee  
Mr. R. N. Ng (NEI)  
Mr. N. S. Reynolds  
Mr. W. T. Russell (NRC)  
Mr. J. E. Tedrow  
Mr. H. L. Thomas

Mr. Stewart D. Ebner  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N.W., Suite 2900  
Atlanta, Georgia 30323

Mr. P. W. O'Connor, Project Manager  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 13H3  
Washington, D.C. 20555

Dr. Eddie F. Thompson  
State Health Officer  
State Board of Health  
P. O. Box 1700  
Jackson, MS 39205

bcc:

Mr. D. G. Bost  
Mr. C. A. Bottemiller  
Ms. M. T. Crayton  
Mr. L. F. Dale  
Mr. L. F. Daughtery  
Mr. W. C. Deck  
Mr. J. G. Dewease  
Mr. M. A. Dietrich  
Mr. J. L. Ensley (ESI)  
Mr. J. J. Fisicaro (RB)  
Mr. J. O. Fowler  
Mr. C. C. Hayes, Jr.  
Mr. L. W. Laughlin (W3)  
Mr. M. J. Meisner  
Mr. D. C. Mims (ANO)  
Mr. D. L. Pace  
Mr. R. L. Patterson  
Mr. J. C. Roberts  
Mr. F. W. Titus  
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FROM: DUE: / /

EDO CONTROL: 0010630  
DOC DT: 11/09/94  
FINAL REPLY:

M. J. Meisner  
Entergy Operations, Inc.

TO:

James Milhoan

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO:

DESC:

ROUTING:

GRADED QA INITIATIVE AT GRAND GULF

Taylor  
Milhoan  
Thompson  
Blaha

DATE: 11/14/94

ASSIGNED TO:

CONTACT:

NRR

Russell

SPECIAL INSTRUCTIONS OR REMARKS:

For appropriate action.