



ENTERGY

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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Quality Assurance Manual Operations (QAMO), Definition of Modification

Gentlemen:

By letter dated July 18, 1994 (OCAN079404), Entergy Operations submitted Revision 17 to the Arkansas Nuclear One (ANO) QAMO in accordance with 10CFR50.71(e). One of the changes made in the QAMO involved a revision to the definition of "modification". The definition previously contained in the QAMO was based on ANSI Standard N45.2.10-1973. In Revision 17, this definition was modified to be consistent with a change made to an ANO design change procedure which eliminated the need for further clarification in the procedure text and was based on "design basis" as defined by 10CFR50.2 instead of "design" as defined by ANSI N-45.2.10. Prior to making this change to the QAMO, the new definition was reviewed to determine whether it would constitute a reduction in commitment in accordance with 10CFR50.54(a). The change to the QAMO definition was determined to be consistent with existing design control requirements and therefore, was determined not to be a reduction in commitment. The QAMO definition change is considered by ANO to be in compliance with 10CFR50, Appendix B, Criterion III, "Design Control".

During a recent NRC review of Revision 17 to the QAMO as documented in February 28, 1995 (OCNA029526) correspondence, the Staff determined that this change would be a reduction in commitment and could not be implemented without prior NRC approval. In discussions with NRC Region IV on March 23, 1995, ANO committed to return the definition of "modification" to that of ANSI N45.2.10-1973 without a need to change ANO's design change process.

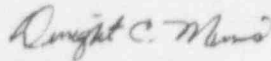
The ANO QAMO definition of "modification" has been subsequently revised to be consistent with ANSI N 45.2.10-1973. The actual page change will be reflected in ANO's next QAMO revision scheduled for October 1995.

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Should you have any further questions, please contact me.

Very truly yours,



Dwight C. Mims
Director, Licensing

DCM/nbm

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