ENTERGY

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0CAN069506

U. S. Nuclear Regulatory Commission
Document Control Desk
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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
Amended Audit Finding Follow-Up Commitment Change

Gentlemen:

By letter dated December 16, 1994 (0CAN129402), Entergy Operations submitted a request for a commitment change to the Arkansas Nuclear One (ANO) Quality Assurance Manual Operations (QAMO) which would take exception to the audit finding follow-up requirements of ANSI N45.2.12-1977, Sections 4.5.1 and 4.5.2. During subsequent telephone conversations, the Staff requested additional clarification concerning the proposed request. Entergy Operations found the dialogue with the Staff to be very helpful in clarifying this issue. Attached is the revised proposed QAMO page change which includes the amended wording which resulted from the telephone conversations with the Staff.

As a result of the conversations with the Staff, it has been determined that the only relief from the ANSI N45.2.12-1977 standard necessary is: (1) from section 4.5.1, deletion of the thirty-day response time for non-significant audit findings, and (2) from section 4.5.2.3, extension of follow-up action to independent organizations other than the Quality Department (the auditing organization). Regarding the thirty-day response time, since the site corrective action system does not specify a maximum response time for non-significant adverse conditions, none need be applied to non-significant audit findings. There is no apparent safety benefit or value-added to lend special treatment to audit findings. For follow-up action on audit findings, the site organization responsible for the corrective action system will assure that appropriate corrective action is identified and scheduled. This follow-up function will remain independent of the audited organization.

The audit process is not being changed. Quality will continue to provide follow-up and close-out of all audit findings. No other aspects of the audit process will be altered except as described above.

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Should you have any further questions, please contact me.

Very truly yours,

Dwight C. Mims

Dwight C. Mims
Director, Licensing

DCM/nbm

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ANSI N45.2.23 (Section 2.3.1.3)	Certification of competence in engineering, sciences, or quality assurance specialties issued and approved by a State Agency, or National Professional or Technical Society, score two (2) credits.	ANO considers holders of NRC-issued Reactor Operator/Senior Reactor Operator License to comply with the requirements of the section and may award two (2) credits to those individuals.
ANSI N45.2.12 (Section 4.5.1)	Management...shall review and investigate any adverse audit findings to determine and schedule appropriate corrective action including action to prevent recurrence and shall respond as requested by the audit report... The response shall clearly state the corrective action taken or planned to prevent recurrence. In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for the corrective action.	In concert with Appendix B, Criterion XVI (Corrective Action) and Section 16.0 of this manual, only those audit findings classified as significant under the site Corrective Action System will require recurrence control and action within thirty days. (If more than thirty days is required, the justification and approval of the extension is documented in accordance with the site corrective action procedure). Response to all audit findings shall be channeled through the site Corrective Action System.
ANSI N45.2.12 (Section 4.5.2)	Followup by auditing organization. Followup action can be accomplished through... other appropriate means.	The followup actions prescribed in this paragraph will be administered through the procedural requirements of the site Corrective Action System. Corrective action plan review to assure corrective action is identified and scheduled will be performed by the appropriate site organization responsible for administering the Corrective Action System; this review group will remain independent of the audited organization. The auditing organization will continue to be responsible for closure of all audit findings following completion of corrective actions.