



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
Response To The Initial Systematic Assessment
Of Licensing Performance Report
(Inspection Report 50-313/95-99; 50-368/95-99)

Gentlemen:

The purpose of this letter is to respond to your February 6, 1995 letter transmitting the initial Systematic Assessment of Licensee Performance (SALP) report for Entergy Operations, Inc., Arkansas Nuclear One (ANO) for the period of July 11, 1993, through January 7, 1995. On March 2, 1995, during a public meeting, you formally presented our SALP results along with additional explanation of our performance during the subject period. During the meeting, we provided verbal comments to the SALP report. This letter constitutes ANO's written comments on the subject report.

The SALP process provides meaningful feedback to ANO management and staff regarding our performance in each functional area. We believe this report was comprehensive and pointed out areas where improvements could be made, but also recognized our self-assessments and the substantial effort ANO has made in numerous areas to improve overall performance and plant safety. The results of ANO's self-assessment efforts are generally consistent with the overall NRC SALP report and feedback. In the functional area of Engineering, we believe that our engineering staff and work products have provided excellent support and significantly contributed to ANO's superior operational performance. We will continue to search for performance improvements in this area as we strive to achieve top industry performance at ANO.

We believe that our employees and management staff are the primary contributors to our continued success and achievement. Teamwork, improved interdepartmental communications, ownership, and the endeavor for common ANO goals have contributed

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significantly to this success. ANO will continue to be challenged to seek continued progress in all areas of plant operations and support in the months and years ahead. 1994 was a very successful year for ANO in almost all areas of plant performance. It is our goal to continue to improve plant performance while enhancing the skills of our staff to better meet the future economic and performance challenges for ANO and Entergy.

In the functional area of Operations, our strong operations program, quality of the operations staff, program improvements, and management have led to excellent overall plant performance. We recognize the concern identified regarding human performance and attention to detail. Some of the initiatives in this area include the establishment of a system wide human performance task force, three part communications, expansion of pre-job briefings, and increased supervisory monitoring.

In the functional area of Maintenance, significant progress has been made. Excellent leadership and support provided by senior management, low backlogs, strong maintenance craft skills, improved craft training, and excellent plant materiel condition have led to the most significant area of improvement at ANO. Increased management attention is being placed on control of planned maintenance activities, handling of on-site loads, and thermal insulation.

In the functional area of Engineering, continued improvements are being achieved. Specifically, effective prioritization, workload management, the planning and implementing of the ventilated dry spent fuel storage cask program, and industry exchange of plant experience were identified as strengths. These and other efforts have significantly contributed to improved plant performance, and through teamwork, improved support to Operations and other functional areas.

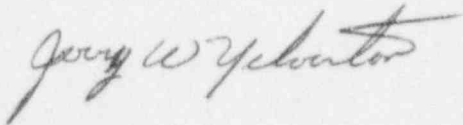
The SALP board made an observation that there were occasions where the engineering resolutions to identified plant problems and engineering modifications were not rigorously evaluated or were based upon erroneous assumptions. Many initiatives are already underway as a result of our self-assessments to address these concerns. Improved training for engineers, enhanced procedural controls for calculations, development of the design review committee, a design error reduction program and an equivalency evaluation process should address the issues identified. Additionally, process improvements continue in the areas of temporary modifications, setpoint control, design change control, minor modification process and configuration control. We recognize that the ANO design control program, and improvements made therein, have not been adequately presented to the NRC. Emphasis will be placed on engineering communications with the NRC over the next several years to ensure we have a good understanding of our direction, changes, and positions. In the near future, ANO intends to present our planned improvements in the area of design control.

- . In the functional area of Plant Support, an overall improving trend was observed plant-wide. Site involvement and ownership, conservative postings, housekeeping, and strict radiological work permit (RWP) requirements contributed to radiological protection program accomplishments. Radiation worker practices are an ongoing challenge and initiatives such as human factoring RWP requirements, enhanced training, ALARA awareness, and improved individual accountability are continuing. In the physical security area, increased management attention is being placed on continuing to improve communications and processes between site and corporate personnel.

Quality must be built into processes including those involving human performance. It is an integral part of all functional areas at ANO. ANO has matured such that performance oversight is a vital part of our overall assessment process. This involves in-line management being responsible for finding and correcting their problems. The future role of Quality Assurance (QA) is to continue meeting audit and surveillance requirements while moving towards a performance based philosophy which supports both the classical audit process and the evolving self-assessment process.

Self-assessments will continue to be an effective performance tool in assessing where overall improvements can be made. Our condition reporting system has also proven to be effective in identifying potential areas for self-assessment. Significant process improvements have been achieved and Entergy will continue to improve our overall performance to place ANO as a world class performer in the nuclear industry.

Very truly yours,



JWY/slp

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