



**Entergy
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May 6, 1996

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Quality Assurance Program Manual Update Submittal

Gentlemen:

Please find enclosed, the Waterford 3 Quality Assurance Program Manual updates generated for the period October 8, 1994 through May 1, 1996. Also enclosed is a list of chapters revised, with a brief statement of the reason for the revision. A revised table of contents is enclosed. This submittal is being made in accordance with 10 CFR 50.54(a)(3). All of the pages of each of the affected chapters are being submitted (instead of only the changed pages) to efficiently account for pagination shifts.

If you have any questions concerning the submittal, please contact Jim Fisicaro at (504) 739-6242 or Don Vinci at (504) 739-6370.

Very truly yours,

M.B. Sellman
Vice President, Operations
Waterford 3

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MBS/OPP/ssf
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cc: (w/Enclosures)
L.J. Callan (NRC Region IV), NRC Resident Inspectors Office
(w/o Enclosures)
C.P. Patel (NRC-NR1), R.B. McGehee, N.S. Reynolds

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Revisions to Quality Assurance Program Manual
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- a) Chapters 1 & 2 Rev. 6.0; Chapters 4, 8 & 13 Rev. 3.0; and Chapters 7 & 10, Rev. 4.0 were revised to show the reporting and responsibility of the W3 site Materials Purchasing & Contracts from the Director, Site Support (on-site) to the Vice President, Operations Support (off-site). All commitments were shifted intact from the Director Site Support to the Vice President, Operations Support.
- b) Chapters 1 & 2 Rev. 6.0 and Chapters 6 & 17 Rev. 4.0 were revised to show the reporting and responsibility of the plant document control personnel from the General Manager Plant Operation (GMPO) to the Director, Site Support. All commitments were shifted intact from the GMPO to the Director, Site Support.
- c) Chapter 2 Rev. 6.0 was revised to specify that the Quality Assurance Program Manual (Special Scope) is not subject to the review and NRC notification requirements imposed on the Quality Assurance Program Manual(QAPM). This addition of information to the QAPM is provided as additional clarification and does not constitute a lessening of commitments.
- d) Chapter 1 Rev. 6.0 and Chapter 16 Rev. 4.0 were revised to show that the Director, Nuclear Safety (through the QA Manager), not the GMPO, is responsible for the administration of a root cause analysis program for identified adverse conditions, and analyzing human performance for trends and publishing a quarterly trend report. The GMPO remains responsible for administration of a trend analysis program for identified equipment failures. This shift in responsibility is intended to improve W3 human performance trend analysis as identified during the 1994 INPO evaluation and does not constitute a lessening of commitments.
- e) Chapter 1 Rev. 6.0 and Chapter 9 Rev. 2.0 were revised to show the Vice President, Engineering is responsible for the administrative, programmatic, and operational control of the Entergy Operations, Inc. welding program, while the GMPO is responsible for implementation of the program at W3. This change is made to comply with ASME, Section 9 QW-201 and QW-300.2 regarding the identification of splits in responsibility regarding the welding program and in no way constitutes a lessening of commitments.
- f) Chapters 1 & 2 Rev. 6.0 were revised to allow departments to perform their own quality reviews of quality related implementing procedures that the QA department performed. The QAPM requires departments to address in their procedure on "the preparation, review, revision, and approval of procedures" how, and by whom, the quality review will be accomplished, with QA responsible for ensuring compliance. The procedure on preparation, review, revision, and approval shall require concurrence of the Quality Assurance Manager. This change allows individual departments to assume additional responsibility without lessening commitments.

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- g) Chapter 3 Rev. 2.0 was revised to allow Design Engineering to perform the review of safety related changes in design to ensure the inclusion of quality assurance requirements. The QA Manager had been responsible for performing this review. Design Engineering will address in their Engineering Reviews procedure how, and by whom, this quality review will be accomplished.
- h) Chapter 1 Rev. 7.0 was also revised to require the engineering reviews procedure to require approval by the Quality Assurance Manager. Quality Assurance will continue to be responsible for ensuring compliance as addressed in QAPM Chapter 1, Rev. 7.0, Paragraph 4.6.2.d.9.
- i) Chapter 9 Rev. 3.0 was revised to add an edition of ASME Section V and to list the implementing procedures for the control of chemical cleaning, and maintenance painting.
- j) Chapter 1 Rev. 8.0 was revised to show the QA Manager is responsible for reviewing all safety related WAs, WAs containing hold points, or WAs involving special processes, and ensuring that quality reviews are conducted for all other initiated WAs. The GMPO is responsible for reviewing all Maintenance initiated WAs not containing a hold point, not involving special processes, or not classified as safety related. The Director Plant Modification and Construction (DPM&C) is responsible for reviewing all Construction initiated WAs not containing a hold point, not involving special processes, or not classified as safety related. The task of performing quality reviews to ensure the inclusion of quality requirements will continue to be accomplished.
- k) Chapter 2 Rev. 7.0 was revised to be consistent with ANSI N18.7-1976 regarding an assessment by a qualified independent organization. The QAPM over restrictive requirement to perform an annual assessment was changed to be in compliance with ANSI N18.7-1976, Section 4.1, which states in part, "these programs for reviews and audits shall, themselves, be periodically reviewed for effectiveness by management of the owner organization."
- l) Chapter 1 Rev. 8.0; Chapter 2 Rev. 7.0 and Appendix A Rev. 3.0 were revised to delete the word annual which confuses the comment originally made to replace audit with assessment. These changes clarify W3's commitment regarding the performance of an assessment in lieu of an audit.
- m) Chapter 9 Rev. 4.0 was revised to add "level one application". This addition was made to clarify that the special processes covered by the QAPM as they apply to safety related items only include Level one application protective coatings.

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- n) Chapter 2 Rev. 7.0 Attachment 1 was administratively revised in paragraph 2 to change the word directives to procedures, paragraph 3 to add the word directives, and paragraphs 7 & 10 to add Department Manager.
- o) Chapter 1 Rev. 9.0 was revised to delete the responsibility for performing a quality review of quality related policies, directives, implementing procedures for the preparation, review, revision and approval of procedures, and changes thereto, and the engineering procedure defining how and by whom the quality review of safety related changes in design will be accomplished from the QA Manager. This change does not reflect a lessening of commitment because the change has been approved by the NRC under Technical Specification Amendment 100.
- p) Chapter 1 Rev. 9.0 and Chapter 5 Rev. 3.0 were revised to indicate that Entergy Operations Management is responsible for ensuring that implementing procedures adequately implement the W3 commitments and obligations. This change does not reflect a lessening of commitment because the change has been approved by the NRC under Technical Specification Amendment 100.
- q) Chapter 2 Rev. 8.0 Attachment 1 was revised to delete the requirement that PORC review the POM procedures. This change does not reflect a lessening of commitment because the change has been approved by the NRC under Technical Specification Amendment 100.
- r) Chapter 10 Rev. 5. was revised to add the same words of Chapter 1 paragraph 4.6.2.d.10 and to eliminate QA from doing the review and now just require the review be done. This change does not reflect a lessening of commitment because the change has been approved by the NRC under Technical Specification Amendment 100.
- s) Chapter 11 Rev. 1.0 was revised to eliminate PORC and the GMPO from the responsibility to review all safety related test procedures prior to implementation, but did retain responsibility for them to review test results resulting in a change to the technical specifications or those that involve an unreviewed safety question. This change does not reflect a lessening of commitment because the change has been approved by the NRC under Technical Specification Amendment 100.

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- t) Chapter 2 Rev. 8.0 and Attachment 1 were revised to add Nuclear Training Procedures as procedures that address aspects of plant management and operations.
- u) Chapter 18 Rev. 4.0 was revised to add distribution of audit reports required by the Safety Review Committee Audit Program to the Vice President, Operations.