



Entergy Operations

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December 3, 1992

OCAN129205

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Procurement and Receipt Inspection Commitment Clarifications

Gentleman:

During review of a previous Arkansas Nuclear One (ANO) submittal dated August 24, 1984 (OCAN088415) in response to a Notice of Violation, three items have been determined to require clarification. Attached is a summary for each associated action relating to our procurement and receipt inspection commitments. These revisions are in accordance with the ANO approved Quality Assurance Manual-Operations (QAMO).

As the Historical Review Project continues to review past correspondence (e.g., OCNA098415) for historical commitments, the necessary revisions or clarification will be documented and submitted to the NRC as part of our periodic update report on historical commitments.

Should you have questions or comments, please call me at 501-964-8601.

Very truly yours,

James J. Pisicaro
James J. Pisicaro
Director, Licensing

JJF/SWB/mmg
attachments

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Clarification of Commitments
Identified in OCAN088415

Action #4

ANO has committed to participate on American Society of Mechanical Engineers (ASME) survey teams to assure that utility concerns are adequately addressed during code surveys. An ASME survey team consists of two ASME representatives, an inspector from the National Board of Boiler Pressure Inspectors, a utility representative, a state representative, and an authorized inspection agency representative. The survey team first performs a detailed review of the auditee's Quality Assurance (QA) manual in order to assure that adequate controls are identified in the manual such that ASME quality program requirements (NCA 3800 or NCA 4000) are satisfied. A program audit by the team members is then performed to assure satisfactory implementation of the program.

As a utility representative on the ASME survey team, ANO will be involved with all aspects of code surveys, and it will have a vote equal to any other survey team member. As such, ANO will be in the position of making sure that utility concerns are reflected when a decision is made to accept or reject an auditee's program. In addition, by participating in code surveys, ANO will be apprised of the latest ASME positions regarding what constitutes an acceptable quality program. This will allow ANO more effectively to keep the Quality Assurance/Quality Control (QC) aspect of its procurement program, including vendor qualification requirements, as current as possible.

One ASME survey has been completed to date and an additional survey is to be scheduled by December 1984. ANO has advised ASME of its availability to participate in additional surveys.

Clarification to Action #4

ANO personnel participated in at least six (6) ASME surveys as utility representatives from 1984 to 1990. Based on industry changes since 1984, changes within Entergy Operations and our participation in the Nuclear Utilities Procurement Issues Committee (NUPIC), improvements have been made to continue our assurance that utility concerns are adequately addressed during code surveys. ASME suppliers are qualified and evaluated in the same manner as are other suppliers with the additional requirement that the evaluator must verify the vendor holds a current ASME certificate for the applicable scope of service.

Entergy Operations believes that participation in ASME surveys provides no additional benefit to participation as part of NUPIC. Participation in an ASME survey does not provide results which can be used in qualification/requalification of the ASME supplier. Currently, an audit of the ASME supplier is performed, either by Entergy Operations or other NUPIC members, to meet our regulatory commitments. Audits of ASME suppliers are either performed by Entergy Operations or by other NUPIC members and adequately convey utility concerns as appropriate. Supplier QA is currently available for participation in ASME surveys of vendors listed on the Qualified Suppliers List (QSL)/Qualified Vendors List (QVL) when requested and time permits.

Based upon the above information, Entergy Operations is clarifying the original commitment. The intent of the original commitment is still being satisfied.

Action #5

ANO has scheduled increased source surveillance activities at suppliers' facilities prior to shipment of selected materials. In addition, ANO will be increasing the number of vendor site surveys, notwithstanding the fact that such vendors may have been surveyed by ASME or others. The actual number of source surveillances and vendor surveys will vary depending on the number and complexity of purchase orders issued as well as the number of QVL additions. Nevertheless, the goal is to increase source surveillance activity by at least twenty-five percent and vendor site surveys by at least fifty percent over 1983 levels. As of August 15, 1984, QA performed 16 vendor surveys and ANO anticipates that an additional eight to ten vendor surveys will be completed by the end of the year.

Clarification to Action #5

Entergy Operations increased source surveillances and vendor site surveys from approximately 15 per year to approximately 70 per year each averaged for the period 1985-1990. Entergy Operations performs audits as required to maintain the qualification of suppliers listed on the QSL/QVL. Per the requirements of Revision 13 to ANO's QA Manual Operations, dated May 1, 1991, the number of audits required, either performed by Entergy Operations or other members of NUPIC, is based on the number of qualified suppliers including the additions and deletions throughout the year. Additionally, surveillance activity varies based on requirements established by the site engineering organizations.

As a result of the Comprehensive Procurement Initiative, additional engineering involvement is included in the procurement of items; therefore, since surveillance activity is directly related to specific procurements, the number will vary based on engineering requirements.

Based upon the above information, Entergy Operations is clarifying the original commitment. The intent of the original commitment is still being satisfied.

Action #8

ANO has established on an interim basis its own program of independent testing. A contract with an independent testing laboratory was established and procedural guidelines for sample selection were issued by May 15, 1984. This program involves the random selection of materials (bolting, pipe, fittings, etc.) with vendor supplied material test reports. These items are then subjected to laboratory analysis and testing to verify the validity of the vendor's certification program. This program will remain in effect until the Nuclear Oversight Committee acts on the recommendation of the QA subcommittee to establish such a program for all Middle South Utilities.

Clarification to Action #8

The independent testing program outlined in the commitment noted above was administered by the ANO Nuclear Quality Department from May, 1984 through October, 1990. During this period, there were no significant findings. In early 1990, several major upgrades in the overall ANO procurement process were initiated in response to industry and regulatory initiatives including procedural implementation of Electric Power Research Institute (EPRI)/Nuclear Construction Issues Group (NCIG) NCIG-07 and EPRI/NCIG-11 as endorsed by the NRC.

Beginning in early 1991, ANO began operation of an onsite material test facility. Procedural guidelines are in place in Procedure 1033.011 "Material Technical Evaluations" that invoke independent testing as appropriate to verify specified technical and quality requirements. This material test facility is equipped with an optical emission spectrometer and other measuring and test equipment. Materials quality and testing personnel have received formal, documented training in the use of this equipment. Furthermore, independent test laboratories are maintained on the QSL and utilized on a regular basis. Currently, the volume of common procurement for all three Entergy Operations generating stations does not appear to justify a consolidated initiative for independent testing capability.

Based upon the above information, Entergy Operations is clarifying the original commitment. The intent of the original commitment is still being satisfied.