

ATTACHMENT

WATERFORD 3 SES

QUALITY ASSURANCE PROGRAM MANUAL UPDATE

PART 1

Changes That Constitute Lessening of Previously Approved Commitments

[Note that revision numbers listed for each item under "Change" represent the revision that was changed and not the resulting revision number.]

1. Change: Chapter 1, Rev. 8 - Organization, Section 4.2.3

Deleted the word "annual" from the previous commitment that the Vice President, Operations, performs a review of the results of annual management assessments to evaluate the effectiveness of the Quality Assurance Program.

Reduction Of Commitment:

A new periodicity was not specified for the performance of management assessments. (NRC Comment #1)

2. Change: Chapter 2, Rev. 7 - Quality Assurance Program, Section. 5.9.1

Replaced the word "annually" with the word "periodically" in the previous commitment that the Vice President, Operations, ensures that a management assessment is conducted annually.

Reduction Of Commitment:

A new periodicity for the performance of management assessments was not specified. (NRC Comment #2)

3. Change: Appendix A, Rev. 3, Paragraph 4, Comment 3

Deleted the word "annual" from the previous statement that "Waterford 3 utilizes designated off-site personnel or an outside agency to perform annual assessments of the entire QA Program including the activities of the on-site audit personnel in lieu of periodic audits.

Reduction Of Commitment:

A new periodicity was not specified for the performance of assessments of the QA Program. (NRC Comment #10)

Reason For Changes 1, 2, and 3 Above:

The above described changes were made to allow Waterford 3 greater flexibility (within the guidelines of ANSI N18.7 - 1976) to perform assessments or have assessments performed on more of a performance based basis.

Justification For Acceptability Of Changes 1, 2, and 3 Above:

The above described deletions of the word "annual" and change to the word "periodic" were incorporated to be consistent with ANSI N18.7 - 1976 regarding providing an assessment by a qualified independent organization. The QAPM overly restrictive requirement to perform an annual assessment was changed to be in compliance with ANSI 18.7 - 1976, Section 4.1, which states in part that "these programs for review and audits shall, themselves, be periodically reviewed for effectiveness by management of the owner organization." Waterford 3 initially did not consider these changes to the upper tier document (QAPM) to be a lessening of commitment because the requirements of ANSI - N18.7 -1996 continued to be met and the effectiveness of the QA Program was considered not to decrease. The Term "Periodic" in Chapter 2, Section 5.9.1 will be qualified by adding in parenthesis the words "not to exceed 24 months". In Chapter 1, Section 4.2.3, after the word "assessments", we will insert the words "described in Chapter 2, Section 5.9.1." In Appendix A, Rev. 3 Paragraph 4, comment 3, the phrase "Periodic (not to exceed 24 months)" will be inserted to replace the word "Annual". These changes will be incorporated into the QAPM upon receipt of your approval. The changes are justified in that the overall period between assessments would not exceed two years. Based on activity schedule alignments, a two year assessment interval would be both acceptable and practical since two years is the accepted interval for performing audits, under the cognizance of the Safety Review Committee (e.g. QAPM Chapter 18, Section 5.2.1d) of activities required by the Operational Quality Assurance Program. The proposed changes increase the amount of new audit results available to be assessed. The current annual assessment frequency results in reassessing areas before they are reaudited and therefore restricting the effectiveness and efficiency of the program. Since effectiveness of the program would not be reduced by the changes, they would also (over time) result in burden reduction as well as a more efficient application of personnel resources.

ATTACHMENT

WATERFORD 3 SES

QUALITY ASSURANCE PROGRAM MANUAL UPDATE

PART 2

Changes That Do Not Constitute Lessening of Previously Approved Commitments

[Note that revision numbers listed for each item under "QAPM Sections Affected By The Change" represent the revision that was changed and not the resulting revision number.]

1. Change:

A change was made to add a new Section 5.10.2 that states that, "NRC notification regarding changes to the Quality Assurance Program Manual (Special Scope) is not required." The NRC stated the concern (letter dated June 20, 1996) that the new Section 5.10.2 effectively reduces the scope of the activities that require NRC notification to change. (NRC Comment #3)

Reason For The Change:

The QAPM (Special Scope) is considered to be a lower tier document in the QA Program document hierarchy. It is not considered to be a part of the QAPM. It is considered to reside at the similar level of hierarchy as departmental procedures and instructions. It simply defines the quality related items and activities not meeting the definition of safety related. The QAPM (Special Scope) has never been submitted to the NRC for review and approval. The new inserted paragraph (5.10.2) was added as a clarification based on an assessment team recommendation.

Justification For Acceptability Of The Change Without Prior NRC Approval:

Since the QAPM (Special Scope) is not considered to be part of the QAPM, and has never been submitted to the NRC in the past, it follows that changes to that manual do not require prior NRC Approval, assuming that the 50.59 review does not identify an unreviewed safety question. Therefore, this was considered not to be a lessening of commitment. The subject change only affects the QAPM (Special Scope) and does not eliminate or delete the plant requirements to submit changes made to actual (applicable) Special Scope programs (Fire Protection, Radiological Effluent, Security, Emergency Preparedness, etc.) to the NRC.

QAPM Sections Affected By This Change:

Chapter 2, Rev. 6, Section 5.10.2

2. Change:

A change was made to replace the requirement for a Plant Operations Review Committee or Quality Assurance Management review, concurrence, or approval of changes to the Plant Operating Manual (POM), Site Support Procedures, Design Engineering Procedures, Design Engineering Administrative Manual, Plant Modification and Construction Procedures, Nuclear Safety Procedures, and Nuclear Training Procedures with the performance of a "quality-related review." The NRC stated the concern that the term "quality-related review" was not defined. (NRC Comment #4)

Reason For The Change:

The portion of the above change that incorporated the term "quality-related review" was initiated to facilitate the relocation of responsibility for certain reviews (previously the responsibility of the QA Manager) to the various departmental managements. The reviews referred to here are those reviews conducted to ensure that the requirements of the QAPM are addressed. The latter is the definition of a "quality-related review". QA remains responsible (via audits, assessments and/or surveillance's) for ensuring that the various groups are performing the quality reviews (Chapter 5, Section 4.2).

The portion of the above change that removed the words "Reviewed by PORC" associated with control of the POM was incorporated in connection with Technical Specification Amendment 100 which redefined PORC procedure review responsibilities and defined qualified reviewer procedure review responsibilities.

In summary, all procedures that received a quality-related review will continue to receive a quality-related review by either a qualified reviewer (under Technical Specification Amendment 100) or by the appropriate departmental quality-related review.

Justification For Acceptability Of The Change Without Prior NRC Approval:

The above described changes did not reduce any commitments without prior NRC approval. The first part of the change described above distributed the responsibility for conducting "quality-related reviews" with the various departments responsible for preparing the procedures. The function is still being performed. QA ensures that the reviews are performed. As stated above "quality-related reviews" are those reviews performed to ensure that the requirements of the QAPM are addressed. This definition will be added to Appendix C of the QAPM.

The second part of the change described above, involving PORC procedure review responsibilities, is in accordance with Technical Specification Amendment 100. PORC review responsibilities are documented in QAPM Chapter 1, Section 4.9.6. The subject change does not represent a lessening of commitments previously approved by the NRC.

QAPM Section Affected By The Change:

Chapter 2, Rev. 8 - Quality Assurance Program, Attachment 1
Chapter 2, Rev. 7 - Quality Assurance Program, Attachment 1

3. Change:

Changes were made to reflect replacement of the previous responsibility of the Quality Assurance Manager to review safety-related design change packages with the responsibility for ensuring that quality reviews of safety-related changes in design are conducted. (NRC Comment #4)

Related Changes were made to reflect the assignment to the Director, Design Engineering, the responsibility for reviewing safety-related changes in design to ensure the inclusion of quality assurance requirements. This responsibility had been with the Quality Assurance Department.

Reason For The Change:

This change was made 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.

Justification For Acceptability Of The Change Without Prior NRC Approval:

The above change did not lessen previous commitments. The reviews for ensuring inclusion of quality assurance requirements are still being performed. The difference is that the responsibility now rests with the Director, Design Engineering. QA's role now is to ensure that the reviews are being adequately performed. Therefore prior NRC approval was not required.

QAPM Sections Affected By The Change:

Chapter 3, Rev. 2, Sections 4.2 and 4.4
Chapter 1, Rev. 7, Section 4.6.2.d.2

4. Change:

A change was made to the QA Manager's responsibilities section which changed the words "maintenance and modification work instructions, inspection and test plans," to "work authorizations." (NRC Comment #6)

Reason For The Change:

This change of terms was made to more accurately apply terminology used at the plant.

Justification For Acceptability Of The Change Without Prior NRC Approval:

The change does not represent a reduction of a commitment previously accepted by the NRC since work authorization (WA) work packages include "maintenance and modification work instruction, inspection and test plans".

QAPM Sections Affected By The Change:

Chapter 10, Rev. 5 - Inspection, Section 4.3.3

5. Change:

A change was made to delete the quality assurance review to verify inclusion of inspection attributes in safety-related inspection procedures. (NRC Comment #7)

Reason For The Change:

The change was made as part of the change involving placing the responsibility for quality related reviews with the departments responsible for preparing the procedures.

Justification For Acceptability Of The Change Without Prior NRC Approval:

The change does not represent a reduction of a commitment previously accepted by the NRC. The reviews to verify inclusion of inspection attributes in safety-related inspection procedures is still being performed. The reviews are being performed by the group responsible for performing the work.

QAPM Sections Affected By The Change:

Chapter 10, Rev. 5 - Inspection, Section 5.2.3

6. Change:

A change was made to replace the Quality Assurance Manager "approval" of the inspection sampling size and selection procedures with the Quality Assurance Manager "concurrence" with the inspection sampling size and selection process. (NRC Comment #8)

Reason For The Change:

This change was made to coincide with the change that placed the responsibility for quality-related reviews of the sampling size and selection procedures with the groups responsible for the work. Since QA is no longer responsible for performing these reviews, "concurrence" was more appropriate.

Justification For Acceptability Of The Change Without Prior NRC Approval:

This change does not constitute a reduction of a commitment previously accepted by the NRC. The sampling size and selection procedures are being approved by the group performing the quality-related review and concurred with by QA through cross-discipline reviews.

QAPM Sections Affected By the Change:

Chapter 10, Rev. 4 - Inspection, Section 5.4

7. Change:

Changes were made to delete the Plant Operations Review Committee (PORC) responsibility for the review and recommendation for approval of test procedures. The NRC stated the concern that as a result, there is no requirement for complying with the requirements of Technical Specification Sections 6.5.1.6 and 6.5.1.7.

Reason For The Change:

Technical Specification Amendment 100 changed PORC review and approval requirements at Waterford 3. Under that amendment, test procedures are reviewed under the qualified reviewer program. QAPM Chapter 5 (Section 5.5) describes the technical review and control process. Qualified Reviewer is defined as an individual selected by a responsible Group Head to perform an independent review of new procedures, procedure revisions, procedure changes, and procedure deletions based on the individuals' qualifications and work discipline. The Qualified Reviewer determines whether or not additional cross-disciplinary reviews are necessary.

Justification For Acceptability Of The Change Without Prior NRC Approval:

This change does not represent a lessening of commitment since Test Procedure reviews formerly performed by PORC are being performed by qualified reviewers. The concept of qualified reviewers was reviewed and concurred with by the NRC in conjunction with Waterford 3 Technical Specification Amendment 100. By Site Directive, PORC reviews the candidates for qualified reviewers and the candidates are approved by the General Manager Plant Operations.

QAPM Sections Affected By The Change:

Chapter 11, Rev.1 - Test Control, Section 4.1.1 and 4.1

8. Change:

The below listed affected section changes resulted in the deletion of responsibilities for the QA Manager and Staff that were being transferred to various groups performing the function.

Reason For The Change:

This change was in alignment with other changes that transferred responsibility to the individual departments to perform their own reviews of quality-related implementing procedures, directives, and policies previously performed by the Quality Assurance Department.

Justification For Acceptability of the Change Without Prior NRC Approval:

This Change did not constitute a reduction or lessening of a commitment since the QA Department responsibilities deleted were transferred to other departments.

QAPM Sections Affected By The Change:

Chapter 1, Rev. 6, Section 4.6.2.d.2
Chapter 1, Rev. 6, Section 4.6.2.d.9
Chapter 2, Rev. 6, Att. 1, Para. 4, 6, 7, 8, 9, & 10

9. Change:

Changes were made to include Nuclear Training Procedures in the list of types of Waterford 3 procedures and instructions.

Reason For The Change:

The changes were made to more accurately identify the types of Waterford procedures and instructions that address required aspects of plant management and operations.

Justification For Acceptability of the Change Without Prior NRC Approval.

This change did not constitute a reduction or lessening of an accepted commitment. The change added information to the QAPM.

QAPM Sections Affected By The Change:

Chapter 2, Rev. 8, Section 5.4.3 and Att. 1, Para. 11
Chapter 18, Rev. 4, Section 5.6.3.e

10. Change:

Changes were made to administratively revise the QAPM sections listed below (changed the word "directives" to "procedures" in one location and inserted the word "directives" in another. Added "Department Manager" as an alternate for approvals of Design Engineering Procedures)

Reason For The Change:

The changes were made to update to the current plant nomenclature and adjust for administrative accuracy.

Justification For Acceptability of the Change Without Prior NRC Approval.

The changes were administrative in nature and did not lessen a commitment previously accepted by the NRC.

QAPM Sections Affected By The Change:

Chapter 2, Rev. 7, Att. 1, Para. 2, 3, 7, and 10

11. Change:

A change was made to add "Level I Application" to the "Protective Coatings" entry in the list of special processes as they are applied to safety-related items.

Reason For The Change:

This change was made for clarification and to more accurately reflect the specification. The spec used for painting is silent for other levels of coating.

Justification For Acceptability of the Change Without Prior NRC Approval.

This change is a clarification and does not represent a lessening of a previously accepted commitment.

QAPM Sections Affected By The Change:

Chapter 9, Rev. 4, Section 5.1.2.h

12. Change:

Changes were made to add references regarding ASME, Chemical Cleaning, and Painting pertaining to special processes.

Reason For The Change:

Revised to add an edition of ASME Section V and to list the implementing procedures for the control of chemical cleaning, and maintenance painting.

Justification For Acceptability of the Change Without Prior NRC Approval.

This change was administrative in nature and did not lessen any commitments previously accepted by the NRC.

QAPM Sections Affected By The Change:

Chapter 9, Rev. 3, Sections 2.7, 2.11, and 2.12

13. Change:

Changes were made reflecting the responsibility split, regarding the Waterford 3 welding program, between the Vice President, Engineering and the General Manager, Plant Operations.

Reason For The Change:

The change was made to show the Vice President, Engineering is responsible for the administrative, programmatic, and operational control of the Entergy welding program, while the General Manager, Plant Operations is responsible for implementation of the program at Waterford 3.

Justification For Acceptability of the Change Without Prior NRC Approval.

This change was 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 does not constitute a lessening of commitments.

QAPM Sections Affected By The Change:

Chapter 1, Rev. 6, Section 4.3.1 and 4.11.1

Chapter 9, Rev. 2, Section 4.1 and 4.4

14. Change:

Changes were made reflecting the shift of responsibility for administering root cause investigation and trend analysis from the General Manager, Plant Operations to the Director, Nuclear Safety.

Reason For The Change:

The changes were made to keep current the placement of responsibilities within the organization.

Justification For Acceptability of the Change Without Prior NRC Approval.

The changes reflect that the Director, Nuclear Safety (through the QA Manager), not the General Manager, Plant Operations (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. [Note that a recent organizational change now has the root cause analysis program reporting directly to the Director, Nuclear Safety.] The GMPO remains responsible for administration of a trend analysis program

for identified equipment failures. This shift in responsibility is intended to improve Waterford 3 human performance trend analysis as identified during the 1994 INPO evaluation and does not constitute a lessening of commitments.

QAPM Sections Affected By The Change:

Chapter 1, Rev. 6, Section(s)	4.3.1.e
	4.3.1.t
	4.6.2.d.14
	4.6.2.d.15

Chapter 16, Rev. 4, Section(s)	4.1.1.a
	4.4.1.d

15. Change:

Changes were made reflecting the shift of responsibility for plant Document Control from the General Manager, Plant Operations to the Director, Site Support.

Reason For The Change:

The Changes were made to keep current the placement of responsibilities within the organization.

Justification For Acceptability of the Change Without Prior NRC Approval.

This change is not considered a reduction of commitment because all commitments were shifted intact from the GMPO to the Director, Site Support.

QAPM Sections Affected By The Change:

Chapter 1, Rev. 6, Section 4.3.1.cc
Chapter 1, Rev. 6, Section 4.5.1.c
Chapter 2, Rev. 6, Att. 1, Para. 4
Chapter 6, Rev. 4, Section(s) 4.1.1 and 4.2.1
Chapter 17, Rev. 3, Section 4.1

16. Change:

Changes were made reflecting the shift in responsibility for "Materials Purchasing & Contracts" from the Director, Site Support (on-site) to the Vice President, Operations Support (off-site).

Reason For The Change:

The changes were made to keep current the placement of responsibilities within the organization.

Justification For Acceptability of the Change Without Prior NRC Approval.

This change is not considered to be a reduction of commitment because all commitments were shifted intact from the Director, Site Support to the Vice President, Operations Support.

QAPM Sections Affected By The Change:

<u>Chapter 1</u>	<u>Chapter 2</u>	<u>Chapter 4</u>	<u>Chapter 7</u>	<u>Chapter 8</u>
<u>Rev. 6</u>	<u>Rev. 6</u>	<u>Rev. 3</u>	<u>Rev. 4</u>	<u>Rev. 3</u>
4.5.1.d	4.4	4.1	4.1	4.1
4.5.1.e	4.9	4.2	4.2.1	4.2
4.5.1.f	Att.1, para. 6		4.2.2	
4.5.1.g			4.2.3	
4.5.1.h				
4.5.1.i				
4.5.1.j				
4.5.1.k				
4.12.1.a				
4.12.1.b.5				
4.12.1.b.6				
4.12.1.b.7				
4.12.1.b.8				
4.12.1.b.9				
4.12.1.b.10				
4.12.1.b.11				
<u>Chapter 10</u>		<u>Chapter 13</u>		
<u>Rev. 4</u>		<u>Rev. 3</u>		
4.2.1				
4.3		4.3		
4.4		4.4		

17. Change:

Changes were made to reflect the provisions of NRC approved Technical Specification Amendment 100 which addresses the Waterford 3 procedure program. The amendment prescribes a Qualified/Technical Reviewer process that is now employed at Waterford 3 in connection with preparation and revision of applicable procedures.

Reason For The Change:

The change was required to allow implementation of the changes approved under Technical Specification Amendment 100.

Justification For Acceptability of the Change Without Prior NRC Approval:

Changes associated with Technical Specification Amendment 100 are in accordance with the concepts already reviewed by the NRC.

QAPM Sections Affected By The Change:

<u>Chapter 1</u>	<u>Chapter 2</u>	<u>Chapter 5</u>	<u>Chapter 10</u>	<u>Chapter 11</u>
<u>Rev. 9</u>	<u>Rev. 8</u>	<u>Rev. 3</u>	<u>Rev. 5</u>	<u>Rev. 1</u>
4.1.3	ATT. 1, para. 4	4.1	4.3.3	4.1
4.6.2.d.2			5.2.3	4.1.1

18. Change:

A change was made to shift the responsibility for performing a quality review of Work Authorization (WA) Packages from the Quality Assurance (QA) Manager to a combination of the QA Manager, General Manager, Plant Operations (GMPO), and the Director, Plant Modification and Construction (DPM&C).

Reason For The Change:

The changes were made to accurately reflect current distribution of responsibilities within the organization. The change was made to document that the QA Manager is responsible for reviewing all safety-related WA's, WA's containing hold points, or WA's involving special processes, and ensuring that quality reviews are conducted for all other initiated WA's. The GMPO is responsible for performing quality reviews of all Maintenance initiated WA's not containing a hold point, not involving special processes, or not classified

as safety-related. The Director, Plant Modifications and Construction is responsible for performing quality reviews of all Construction initiated WA's not containing a hold point, not involving special processes, or not classified as safety-related.

Justification For Acceptability of the Change Without Prior NRC Approval:

The above described change does not lessen any commitments previously accepted by the NRC. The task of performing quality reviews to ensure the inclusion of quality requirements will continue to be accomplished. The difference is that the reviews will be independently performed by the groups that are responsible for the work.

QAPM Sections Affected by the Change:

Chapter 1, Rev. 8 - Section(s)	4.3.1.x
	4.4.1.e
	4.6.2.d.10

ATTACHMENT
WATERFORD 3 SES
QUALITY ASSURANCE PROGRAM MANUAL UPDATE
PART 3
Corrective Actions

Waterford 3 completed an in-depth review of the May 6, 1996 QAPM update submittal and identified three (3) changes as a reduction in commitment. These changes have been entered into the Waterford 3 Corrective Action Program and will be addressed in the Root Cause Analysis (RCA) for Condition Report (CR) CR-96-1409. This CR was written to address an identified weakness in the 10CFR50.54 process.

Preliminary findings have identified that the site 10CFR50.54 process has inadequately controlled changes being implemented in lower tier documents that impact the QAPM prior to the performance of a 10CFR50.54 evaluation. As a result, 10CFR50.54 evaluations were being performed after the fact, when the QAPM is updated to reflect the lower tier change. Note that a recent major revision of the plant 10CFR50.59 Safety and Environmental Impact Evaluation Procedure (W2.302 effective 9/30/96) includes elements that require assessing the impact of proposed changes to 10CFR50.54 programs/plans before a procedure change is processed. This revision will be reviewed in light of the current findings to determine whether further enhancements and/or corrective measures are necessary to assure that 10CFR50.54 impact is adequately assessed prior to implementing a change.

Another weakness in the 10CFR50.54 program involved the interpretation of what constitutes a lessening of commitment in the QAPM. The criteria applied weighed heavily upon whether the change lessened the effectiveness of the program. This allowed some changes that were relative reductions in content to be made and not be identified by the 10CFR50.54 evaluation.

Results of the RCA will dictate the required corrective actions to enhance the 10CFR50.54 process to preclude a repeat of this occurrence.

Waterford 3 will review all QAPM changes prior to the May 6, 1996 submittal to ensure that none of the changes resulted in a reduction of commitment. If any of the changes are identified as a reduction, a CR will be generated to identify the change in the Corrective Action Program and appropriate actions taken to correct the deficiency. Also, any changes of this nature will be sent to the NRC for approval. If the changes are identified prior to completion of the change, the change will be forwarded to the NRC for approval prior to incorporation. Note that Entergy is hereby requesting approval for the three changes described in Part 1 of this attachment.

ATTACHMENT
WATERFORD 3 SES
QUALITY ASSURANCE PROGRAM MANUAL UPDATE
PART 4
Copies of the Changed Pages of the QAPM

NOTES:

1. To account for possible shifts in pagination, a copy of the entire chapter that contains a change has been included.
2. Change Bars in the right margin identify the revisions associated with the changes.