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May 7, 1997

U. S. Nuclear Regulatory Commission
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Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

River Bend Station
Docket No. 50-458
License No. NPF-47

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

Waterford 3 Steam Electric Station
Docket No. 50-382
License No. NPF-38

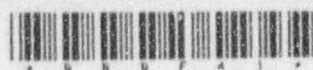
Subject: EOI Licensing Basis Assessment And UFSAR Review Initiatives

CNRO-97/00010

Gentlemen:

On September 27, 1996, the NRC published a Staff Requirements Memorandum (SECY-96-154), "Proposed Revision to NRC Enforcement Policy, NUREG-1600, Enforcement Guidance for Departures from the FSAR in Violation of 10CFR50.59 and for Failures to Update the FSAR in Violation of 10CFR50.71(e)." The revised Enforcement Policy was published in the *Federal Register* on October 18, 1996 (61FR54461). The revised policy provided new guidance for severity levels and civil penalties involving violations of 10CFR50.59 and 10CFR50.71(e). In addition, the Staff revised the Policy in Section VII.B.3 to include an enforcement discretion provision for encouraging licensees to identify and correct FSAR discrepancies through voluntary initiatives. The discretion is available for two years beginning on the date of the *Federal Register* publication. As discussed in the Staff Requirements Memorandum, to be able to receive enforcement discretion, the licensee's voluntary initiative must be described in writing and be publicly available.

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May 7, 1997

CNRO-97/00010

Page 2 of 3

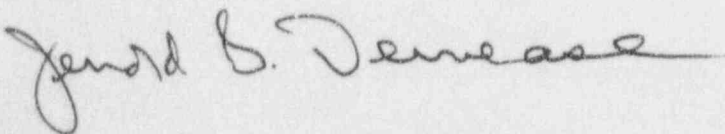
Entergy Operations, Inc. (EOI) recognizes the need to ensure that our sites' Updated Final Safety Analysis Reports (UFSARs) are accurate and the associated update processes are effective in evaluating changes and revising the UFSAR. Therefore, beginning in June of 1996, EOI performed licensing basis assessments utilizing EOI-based teams. These assessments were performed at Arkansas Nuclear One, Units 1 and 2; Grand Gulf Nuclear Station; River Bend Station and Waterford-3 Steam Electric Station. The assessment methodology used by Entergy Operations is consistent with NEI 96-05, "Guidelines for Assessing Programs for Maintaining the Licensing Basis." The scope of the assessments included reviewing 10CFR50.59 and 10CFR50.71(e) control processes and sampling sections in the UFSARs to evaluate their overall adequacy. While no safety significant issues were identified, EOI concluded that additional UFSAR reviews and certain control process improvements were appropriate. EOI presented the results of our findings to NRR on November 14, 1996 and to NRC Region IV on December 17, 1996.

Each of the EOI sites submitted their response to the NRC's Request for Information Pursuant to 10CFR50.54(f) Regarding the Adequacy and Availability of Design Bases Information in early February, 1997. In the responses, a brief discussion of the planned UFSAR review initiatives was provided for each site based on the individual site specific assessment findings. These UFSAR review initiatives are either underway or are currently being developed at the individual sites. Since the scope and details of the site initiatives may change as the reviews progress, details of the site-specific programmatic UFSAR reviews will be available at the sites for examination.

The EOI presentations to the NRC in November and December, 1996 provided our methodology in performing the licensing basis assessments and our intent to perform additional UFSAR reviews. While we believe that our meetings with the NRC served to qualify for enforcement discretion under Section VII.B.3 of the revised Enforcement Policy, this letter formally documents our actions.

If you have further questions, please contact Steve Bennett at (501) 858-4626.

Sincerely,



JGD/SAB/baa

cc: (See Next Page)

EOI Licensing Basis Assessment And UFSAR Review Initiatives

May 7, 1997

CNRO-97/00010

Page 3 of 3

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