

July 25, 1996

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U. S. Nuclear Regulatory Commission
Document Control Desk
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Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPK-51 and NPF-6
Audit Frequency Commitment Change

Gentlemen:

Pursuant to 10CFR50.54(a)(3), Entergy Operations is submitting a proposed change to the Arkansas Nuclear One (ANO) Quality Assurance Manual Operations (QAMO). The proposed change results in a reduction of a previously approved commitment; therefore, NRC approval is requested prior to implementation.

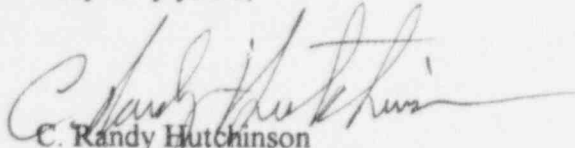
The proposed commitment change will change the frequencies for the performance of specific audits. A discussion of the commitment change pursuant to 10CFR50.54(a)(3)(ii) is provided in Attachment 1. The proposed QAMO change is provided in Attachment 2.

Should you have any questions, please contact me.

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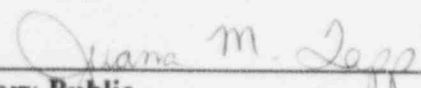
Very truly yours,


C. Randy Hutchinson
Acting Vice President Operations

CRH/nbm
Attachments

To the best of my knowledge and belief, the statements contained in this submittal are true.

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for Johnson
County and the State of Arkansas, this 25 day of July, 1996.


Notary Public
My Commission Expires 11-8-2000



cc: Mr. Leonard J. Callan
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Attachment 1 Discussion of Proposed Change

Proposed Change

The proposed change will revise the ANO QAMO commitment regarding the audit frequency requirements of ANSI N18.7 and Regulatory Guide 1.33 Revision 2 Section C.4. The frequencies for the performance of specific audits will be replaced with a requirement which will ensure that audits of selected aspects of operational phase activities are performed with a frequency commensurate with their safety significance, but not to exceed a period of two years.

The ANO QAMO Section 18.3.2 requirements, derived from the requirements of ANSI N18.7-1976 and Reg. Guide 1.33 Rev. 2, are being revised to remove the specified audit frequencies and replace them with an adjusted audit frequency based upon performance indicators not to exceed a two year minimum audit frequency. Additionally, Table 1 of the QAMO is being revised to describe exceptions and interpretations related to this change.

This change does not change the requirements or criteria for the conduct of audits. The change also does not affect the audit frequencies established by regulatory requirements or the ANO Fire Protection Program as described in the QAMO Appendix B.

Reason For Change

The current QAMO commitment requires that specific audits be performed at pre-specified frequencies regardless of an area's performance history, safety significance, or any other criteria. At a station with mature operational programs, this approach limits flexibility in the utilization of QA resources. The revised commitment would permit a more responsive and efficient use of resources in response to area performance indicators. Specifically, this change will allow the auditing function to reduce coverage in areas where performance indicators show no indication of problems and to direct more attention to areas where problems are suspected, or indicated, subject to a two year maximum duration between any specific area audit.

Approval of this proposed change will allow ANO to: 1) take full advantage of the recommended audit frequencies contained in the ANSI standards, 2) allow modification of these frequencies based upon area performance, and 3) formalize the method and use of periodic audit area performance evaluations in an effort to enhance the utilization of a performance based approach to scheduling QA activities.

Basis for Conclusion the Change Continues to Satisfy 10CFR 50, Appendix B

The 10CFR50, Appendix B criteria applicable to the subject matter involved with this change is XVIII, "Audits". The proposed change has no adverse impact regarding ANO implementation of this regulatory requirement. Rather, this change provides the opportunity to implement the requirements in a more dynamic manner. Audit activities will continue to be planned and performed on a periodic basis to provide coverage of all aspects of the ANO Quality Assurance Program.