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Director, Nuclear Licensing

10 CFR 50.54(a)(4)

OCAN042105  
CNRO-2021-00013

April 30, 2021

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

Subject: Supplement to Response to Request for Additional Information  
Reduction of Commitment to the Entergy Operation's  
Quality Assurance Program Manual Description

Arkansas Nuclear One, Units 1 and 2  
NRC Docket Nos. 50-313, 50-368, and 72-13  
Renewed Facility Operating License Nos. DPR-51 and NPF-6

By Reference 1, Entergy Operations, Inc. (Entergy) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for approval of a revision to the Entergy Quality Assurance Program Manual (QAPM), Revision 39, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2). The proposed revision results in a reduction in commitment to the previously accepted Quality Assurance (QA) program that was submitted for NRC review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.54(a)(4).

Specifically, in Reference 1, Entergy requested that treatment of safety-related Class 2 and 3 structures, systems, and components (SSCs) identified as Low Safety Significance (LSS) in accordance with the American Society of Mechanical Engineers (ASME) Code Case N-752, "Risk-Informed Categorization and Treatment for Repair/ Replacement Activities in Class 2 and 3 Systems, Section XI, Division 1," not be required to meet the requirements of the QAPM. Instead, Entergy indicated that it would develop program elements describing treatment of these LSS SCCs to ensure continued capability and reliability of the design basis function.

The NRC staff reviewed the application and determined that additional information was needed to complete its review (Reference 2). The response to the request was submitted via Reference 3. During a conference call between the NRC and Entergy, on April 15, 2021, the NRC requested a supplement to the response to the request for additional information. The supplement is enclosed.

No new regulatory commitments are included in this submittal.

If there are any questions or if additional information is needed, please contact Riley Keele, Manager, Regulatory Assurance, Arkansas Nuclear One, at 479-858-7826.

Respectfully,

**ORIGINAL SIGNED BY RON GASTON**

Ron Gaston

RWG/rwc

- Reference:
1. Entergy Operations, Inc. (Entergy) letter to the U. S. Nuclear Regulatory Commission (NRC), "Reduction of Commitments to the Entergy Operation's Quality Assurance Program Manual Description," (OCAN102002), dated October 26, 2020 (ML20300A324)
  2. NRC email to Riley Keele (Entergy), "ANO-1 and ANO-2 – Final RAI RE: Proposed Change to Quality Assurance Program Manual" (EPID L-2020-LLQ-0005), dated March 10, 2021
  3. Entergy letter to the NRC, "Response to Request for Additional Information Reduction of Commitments to the Entergy Operation's Quality Assurance Program Manual Description," (OCAN042101), dated April 5, 2021

Enclosure: Supplement to Response to Request for Additional Information

Attachments to Enclosure:

1. Quality Assurance Program Manual Page Markup
2. Retyped Quality Assurance Program Manual

cc: NRC Region IV Regional Administrator  
NRC Senior Resident Inspector – Arkansas Nuclear One  
NRC Project Manager – Arkansas Nuclear One  
Designated Arkansas State Official

**ENCLOSURE**

**0CAN042105**

**SUPPLEMENT TO REPOSE TO REQUEST  
FOR ADDITIONAL INFORMATION**

## **SUPPLEMENT TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

By Reference 1, Entergy Operations, Inc. (Entergy) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for approval of a revision to the Entergy Quality Assurance Program Manual (QAPM), Revision 39, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2). The proposed revision results in a reduction in commitment to the previously accepted Quality Assurance (QA) program that was submitted for NRC review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.54(a)(4).

Specifically, in Reference 1, Entergy requested that treatment of safety-related Class 2 and 3 structures, systems, and components (SSCs) identified as Low Safety Significance (LSS) in accordance with the American Society of Mechanical Engineers (ASME) Code Case N-752, "Risk-Informed Categorization and Treatment for Repair/ Replacement Activities in Class 2 and 3 Systems, Section XI, Division 1," not be required to meet the requirements of the QAPM. Instead, Entergy indicated that it would develop program elements describing treatment of these LSS SSCs to ensure continued capability and reliability of the design basis function.

The NRC staff reviewed the application and determined that additional information was needed to complete its review (Reference 2). The response to the request was submitted via Reference 3. During a conference call between the NRC and Entergy, on April 15, 2021, the NRC requested a supplement to the response to the request for additional information.

The NRC requested detailed description of the supplemental procurement requirements and controls that will be specified by Entergy to confirm with reasonable assurance that Class 2 and 3 LSS SSCs will remain capable of performing their intended safety-related functions under design basis conditions. The requested details are provided in Table 1.

Additionally the NRC had questions concerning the proposed revision to the QAPM, provided in Reference 3. They questioned if the revised text accurately reflects that current processes and procedures will be used for the treatment of the LSS SSCs.

In Entergy's proposed revision to the QAPM, new paragraph A.7.c has been revised to accurately reflect that the current processes and procedures will be used for treatment of LSS SSCs. The revision to the proposed change is in the last sentence which now reads:

Instead, treatment of these LSS SSCs is performed in accordance with existing QAP procedures and processes which include supplemental controls to ensure the capability and reliability of the SSCs design basis function.

See Attachment 1 for the marked-up page. Attachment 2 includes clean (revised) copy of the proposed change.

## References

1. Entergy Operations, Inc. (Entergy) letter to the U. S. Nuclear Regulatory Commission (NRC), "Reduction of Commitments to the Entergy Operation's Quality Assurance Program Manual Description," (OCAN102002), dated October 26, 2020 (ML20300A324)
2. NRC email to Riley Keele (Entergy), "ANO-1 and ANO-2 – Final RAI RE: Proposed Change to Quality Assurance Program Manual" (EPID L-2020-LLQ-0005), dated March 10, 2021
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**TABLE 1**  
**DESCRIPTION OF THE SUPPLEMENTAL PROCUREMENT**  
**REQUIREMENTS AND CONTROLS**

Entergy will specify the following supplemental procurement requirements and controls to confirm with reasonable assurance that Class 2 and 3 LSS SSCs will remain capable of performing their intended safety-related functions under design basis conditions.

**PROCUREMENT INCLUDES THE FOLLOWING:**

- The material on this order shall comply with the following quality and technical requirements. exceptions should be identified
- The item shall be free from defects in design and workmanship
- The supplier shall comply with all technical, quality, and commercial requirements imposed on the subject purchase order or request for quote. Any exceptions shall be listed on the quotation as "exceptions" and shall be accepted in writing by Entergy Operations, Inc. prior to proceeding with the order. Modification to the requirements of the order can be made only by a revision to the order by Entergy Operations, Inc. Items that do not meet purchase order requirements may be returned at supplier's expense.
- The supplier shall make no changes in design (e.g., form, fit, function or material). This includes changes in computer/digital subcomponents, such as programming changes to processing elements, or changes from analog or solid-state to digital hardware or vice-versa. If unable to fill the order exactly as written, the supplier shall promptly notify Entergy Operations, Inc. in writing prior to proceeding with the questionable item. any changes to the requirements of the order can be made only by a revision to the order by Entergy Operations, Inc.
- The supplier shall package, store, handle, and ship all items in such a way as to assure that the integrity and operability of the items are not degraded.
- The supplier shall mark or tag each item bundle, or container with shipping destination, Entergy Operations, Inc. purchase order and supplement or revision number, line item number, description, and part number. When the above designated markings are not possible, provisions shall be made to positively identify ordered items by some other means, which shall be communicated to Entergy Operations, Inc. prior to shipment. all items shall be identified on an enclosed packing list.

**RECEIPT INSPECTION ATTRIBUTES**

- **IDENTIFICATION AND MARKING:** Correct part number/purchase order number and supplement or revision number
- **PROTECTIVE COVERS AND SEALS:** Integrity of item has not been degraded

**TABLE 1**  
**(continued)**

- **PHYSICAL DAMAGE:** Items/parts are not broken, cracked, missing, deformed, or misaligned. accessible internal and external areas free of gouges, dents, scratches and burns that could be detrimental to form, fit or function.
- **CLEANLINESS:** Items clean and free from contaminants, manufacturing residue and/or cleaning material (including lint, solvent, residue, etc.)
- **WORKMANSHIP:** Item visibly defect free

**QC RECEIVING INSPECTION ATTRIBUTES**

- QSL messages, Q print codes, Standard Messages and other messages appear appropriate and complete
- Surveillance activities performed/waived
- Part number in data base agrees with part and documentation provided or explanation of differences is provided (i.e., correct part number is on part, vendors stocking number is on documentation)
- No open Part Equivalent Evaluation affecting this receipt
- Purchase Order revision level, if greater than zero is correctly reflected on required documentation. (For blanket orders, release number is also correct. If revisions do not affect the receipt it is noted.
- Shelf life has been correctly assigned. No unaddressed conflict between what was requested of the vendor and receiving requirements (i.e., vendor to supply shelf life and did not or supplied shelf life drastically different than expected – 2 years vs. 20)
- Shelf life information on the part or its packaging has been corrected or removed to avoid conflict with the date entered into Asset Suite.
- Storage/shipping level invoked on the supplier agrees with that referenced in the inspection or supplier provided documentation– if referenced at all.
- Batch, lot or serial numbers used as trace numbers are correctly input and match all associated documentation.
- Certificates of compliance/code data packages reflect the correct material specification, year, addenda, and code class based on “B” print codes.

**TABLE 1**

**(continued)**

- All Over, Short, Damaged, and Discrepant (OSD&D) forms are closed and stock correctly released to inventory, returned to vendor, or scrapped, per OSD&D disposition.
- All standards and procedures were correctly acknowledged. Appropriate comments were included
- M&TE used was recorded
- Sample plan information was recorded
- In storage maintenance requirements on CID have been satisfied and/or any new information provided by the supplier was considered.
- Identified Counterfeit / Fraudulent Suspect Item (CFSI) issues have been addressed.
- Identified RAM has been addressed.
- Identified ESD items have been addressed.
- Identified Chemical/Hazardous material receipt has been addressed.
- Dedication activities were adequately documented
- Condition Reports were initiated and documented as required
- For material transfers – Part Equivalent Evaluation was initiated and completed
- Identified potential Cyber Security related material receipt has been addressed.
- Documentation provided as proprietary is processed in accordance with appropriate procedures.



**ENCLOSURE, ATTACHMENT 1**

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**QUALITY ASSURANCE PROGRAM MANUAL PAGE MARKUP**  
(2 Pages)

**A.** (continued)**7. Regulatory Commitments**

- a. Except where alternatives are identified, Entergy complies with the QA guidance documents listed on Table 1. If the guidance in one of these documents is in conflict with the QAPM, the guidance provided in the QAPM is the controlling guidance. Additionally, the following clarifications apply to all guidance documents listed in Table 1:
  1. For modifications and nonroutine maintenance, guidance applicable to construction-like activities is applicable to comparable plant activities. Except that the inspection of modifications, repairs, rework, and replacements shall be in accordance with the original design and inspection requirements or a documented approved alternative.
  2. The definitions provided by Regulatory Guide 1.74 and associated clarifications as described in Table 1 apply wherever the defined term is used in the QAPM and associated guidance documents.
  3. Clarification to a guidance document applies wherever the guidance document is invoked.
  4. In each of the ANSI standards, other documents (e.g., other standards, codes, regulations, tables, or appendices) are referenced or described. These other documents are only quality assurance program requirements if explicitly committed to in the QAPM. If not explicitly committed to, these documents are not considered as quality assurance program requirements, although they may be used as guidance.
  5. Guidance applicable to safety related items and activities is applicable to comparable items and activities controlled by 10 CFR 72 and transportation packages controlled by 10 CFR 71.
- b. The NRC is to be notified of QAPM changes in accordance with 10 CFR 50.54(a)(3) or 10 CFR 50.54(a)(4).
- c. For those sites who have received NRC authorization to use the alternative repair/replacement categorization and treatment requirements of Code Case N-752 in lieu of the corresponding sections of ASME Section XI, as referenced in 10 CFR 50.55a Codes and Standards, treatment of safety-related structures, systems, and components (SSCs) identified as low safety significant (LSS) Class 2 and 3 SSCs in accordance with ASME Code Case N-752 is not required to meet the requirements of this manual. Instead, treatment of these LSS SSCs is performed in accordance with existing QAP procedures and processes



## QUALITY ASSURANCE PROGRAM MANUAL

which include supplemental controls to ensure the capability and reliability of the SSCs design basis function.

**ENCLOSURE, ATTACHMENT 2**

**0CAN042105**

**RE-TYPED QUALITY ASSURANCE PROGRAM MANUAL PAGE**  
(2 Pages)

**A.** (continued)**7. Regulatory Commitments**

- a. Except where alternatives are identified, Entergy complies with the QA guidance documents listed on Table 1. If the guidance in one of these documents is in conflict with the QAPM, the guidance provided in the QAPM is the controlling guidance. Additionally, the following clarifications apply to all guidance documents listed in Table 1:
  1. For modifications and nonroutine maintenance, guidance applicable to construction-like activities is applicable to comparable plant activities. Except that the inspection of modifications, repairs, rework, and replacements shall be in accordance with the original design and inspection requirements or a documented approved alternative.
  2. The definitions provided by Regulatory Guide 1.74 and associated clarifications as described in Table 1 apply wherever the defined term is used in the QAPM and associated guidance documents.
  3. Clarification to a guidance document applies wherever the guidance document is invoked.
  4. In each of the ANSI standards, other documents (e.g., other standards, codes, regulations, tables, or appendices) are referenced or described. These other documents are only quality assurance program requirements if explicitly committed to in the QAPM. If not explicitly committed to, these documents are not considered as quality assurance program requirements, although they may be used as guidance.
  5. Guidance applicable to safety related items and activities is applicable to comparable items and activities controlled by 10 CFR 72 and transportation packages controlled by 10 CFR 71.
- b. The NRC is to be notified of QAPM changes in accordance with 10 CFR 50.54(a)(3) or 10 CFR 50.54(a)(4).
- c. For those sites who have received NRC authorization to use the alternative repair/replacement categorization and treatment requirements of Code Case N-752 in lieu of the corresponding sections of ASME Section XI, as referenced in 10 CFR 50.55a Codes and Standards, treatment of safety-related structures, systems, and components (SSCs) identified as low safety significant (LSS) Class 2 and 3 SSCs in accordance with ASME Code Case N-752 is not required to meet the requirements of this manual. Instead, treatment of these LSS SSCs is performed in accordance with existing QAP procedures and processes



## QUALITY ASSURANCE PROGRAM MANUAL

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