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2012 MAY 30 A 10:23

John F. McCann
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CNRO-2012-00004
ENOC-12-00011

May 21, 2012

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

SUBJECT: Request for Additional Information Regarding Changes to the Entergy Quality Assurance Program Manual (QAPM) and Associated Plant Technical Specifications Regarding Staff Qualifications

River Bend Station
Docket Nos. 50-458 and 72-49

Grand Gulf Nuclear Station
Docket Nos. 50-416 and 72-50

Arkansas Nuclear One
Units 1 and 2
Docket Nos. 50-313, 72-13 and
50-368

Indian Point Nuclear Generating
Units 1, 2, and 3
Docket Nos. 50-003, 50-247, 72-51
and 50-286

Pilgrim Nuclear Power Station
Docket No. 50-293

Waterford 3 Steam Electric Station
Docket No. 50-382 and 72-75

James A. FitzPatrick Nuclear Power
Plant
Docket Nos. 50-333 and 72-12

Palisades Nuclear Plant
Docket Nos. 50-255 and 72-7

Vermont Yankee Nuclear Power
Station
Docket Nos. 50-271 and 72-59

Big Rock Point Nuclear Plant-ISFSI
Docket Nos. 50-155 and 72-43

REFERENCES: 1. Request for Approval of Changes to the Entergy Quality Assurance Program Manual (QAPM) and Associated Plant Technical Specifications Regarding Staff Qualifications, dated December 13, 2011, CNRO-2011-00006/ENOC-11-00025 (ADAMS Accession Number ML11356A278)

Dear Sir or Madam:

By email on April 5, 2012, the Nuclear Regulatory Commission (NRC) requested additional information regarding certain aspects of Entergy's request to change the QAPM and plant Technical Specifications regarding staff qualifications (Reference 1). The proposed changes would standardize unit staff qualification requirements for the Entergy fleet. Attachment 1 provides responses to the request for additional information. Attachment 2 provides a revised markup for the proposed QAPM changes that replace pages 2 and 3 of Attachment 1 to Enclosure 1 of Entergy's initial request letter (Reference 1). These changes do not affect the

requested Technical Specification changes and no change is needed to the no significant hazards consideration included in the initial request. There are no new commitments included in this letter other than the additional proposed changes to the QAPM.

If you have any questions or require additional information, please contact Bryan Ford at 601-368-5516.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 21, 2012.

Sincerely,



JFM/BSF/LAE/RWB

- Attachment: 1. Response to Request for Additional Information Regarding the Entergy Quality Assurance Program Manual (QAPM) and Associated Plant Technical Specifications Regarding Staff Qualifications
2. Revised QAPM

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Attachment 1

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE ENTERGY QUALITY ASSURANCE PROGRAM MANUAL (QAPM) AND
ASSOCIATED PLANT TECHNICAL SPECIFICATIONS REGARDING STAFF
QUALIFICATIONS, REVISION 22**

Question 1.0.1

Entergy's QAPM, Revision 21, Table 1, Regulatory Commitments states that Entergy is committed to Regulatory Guide 1.8, Revision 1, dated 1975. The QAPM, Revision 21, Clarification/Exception section states, "Qualification requirements for personnel, other than Licensed Operators covered under 10 CFR 55, shall meet ANSI/ANS 3.1-1978 except for positions where an exception to either ANSI/ANS 3.1-1978 or N18.1-1971 is stated in the applicable unit's Technical Specifications. If an exception exists for a given position, the applicable unit's Technical Specification qualification requirements shall apply." The proposed revision to the QAPM will delete the above statement and replace it with:

Entergy is committed to Sections 1 - 4 of ANSI/ANS 3.1-1978 with following clarifications and exceptions.

Qualification requirements for personnel shall meet ANSI/ANS 3.1-1978 except the following:

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2, 1987.*
- b. Managers required to hold an SRO license are specified in the applicable unit's Technical Specifications.*
- c. Licensed Operators shall be qualified in accordance with the requirements of 10 CFR 55.*

The proposed QAPM revision will remove the referenced N18.1-1971 Standard that Regulatory Guide 1.8 endorses. Please provide clarification of what revision of Regulatory Guide 1.8 Entergy will be committed to when the Regulatory Guide 1.8, Revision 1, which endorsed Standard N18.1-1971, is removed.

Response:

The Entergy Quality Assurance Program Manual (QAPM) is organized in a format that is consistent with chapter 17.3 of NUREG-0800, Standard Review Plan (SRP). Section A.7 of the QAPM discusses Entergy's regulatory commitments corresponding to section II.A.7 of chapter 17.3 of the SRP which states:

"Except where acceptable alternatives are provided, the applicant is to comply with the regulatory positions in the appropriate revisions of the regulatory guides listed in Section VI.A of this chapter. Section VI.A lists regulatory guides issued in response to Appendix B to 10 CFR Part 50."

Section VI.A of the SRP lists Regulatory Guide (RG) 1.8, "Personnel Selection and Training" as one of the regulatory guides to which applicants should comply or provide acceptable alternatives.

The QAPM lists RG 1.8, Rev. 1, 1975 as the revision to which alternatives to the regulatory positions are proposed. This revision is referenced because, even though ANSI/ANS 3.1-1978 was approved as an alternative for many plants, subsequent revisions to the RG did not specifically endorse ANSI/ANS 3.1-1978. Entergy is taking exception to Section C, "Regulatory Position", of RG 1.8 Rev. 1 by, as an alternative, committing to ANSI/ANS 3.1-1978 with the specified clarifications and exceptions to that standard.

As discussed in the response to question 1.0.4, Entergy proposes to change the word "General" in section A.1 of Table 1 to "Section C" to clarify which part of the RG is being excepted. This is an editorial change for clarification purposes and does not change the scope or justification of Entergy's request.

Question 1.0.2

Entergy's current QAPM states in part:

"Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation."

Entergy's proposed revision to the QAPM adds the proposed insert:

"Individuals who do not possess the formal education and minimum experience requirements for the manager responsible for quality assurance should not be eliminated automatically when other factors provide sufficient demonstration of their abilities. These other factors are evaluated on a case-by-case basis and approved and documented by senior management."

The current statement in the QAPM and the proposed insert are in conflict with each other. Please provide clarification on how Entergy plans to evaluate individuals on a case-by-case basis for acceptability if the current statement is not removed.

Response:

The two paragraphs referenced above have different applications. The first paragraph (the current QAPM statement) applies to all of the positions discussed in ANSI/ANS 3.1-1978 whereas the second paragraph applies only to the manager responsible for quality assurance.

The first paragraph, known as a "Grandfather Clause", was included in Rev. 0 of the QAPM as approved by the NRC. The intent of the paragraph was to allow those incumbents who were qualified under existing commitments to remain fully qualified for their positions when the new qualification requirements were implemented. When the incumbent is replaced, the new

requirements apply to the replacement. The NRC Safety Evaluation (Reference 2) for the initial QAPM stated:

“This clarification was added because some positions at some plants may have additional qualification requirements added as a result of the consolidated QAPM change. It is included as a “Grandfather Clause” to allow those incumbents who are currently qualified under existing commitments to remain fully qualified for their positions when the new requirements are implemented. The staff finds this acceptable as the licensee is voluntarily upgrading its commitments, the incumbents remain fully qualified to perform their jobs, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.”

As Entergy standardizes the qualification requirements for the fleet, some plants may have additional requirements. For example, some of the Radiation Protection Manager requirements of RG 1.8 Rev. 2 are more restrictive, such as new requirements for onsite experience (see section 3.1.3.1 of enclosure 2 of Entergy’s request, Reference 1). Entergy plans to use the above paragraph in like manner to allow incumbents to remain qualified and avoid creating new qualification documents for incumbents. Incumbent replacements will be qualified in accordance with the approved commitments.

The proposed new paragraph regarding the qualifications for the manager responsible for quality assurance (QA), section 4.1 ANSI/ANS 3.1-1978 states:

“Nuclear Power Plant Personnel shall have a combination of education, experience, health, and skills commensurate with their functional level of responsibility which provides reasonable assurance that decisions and actions during normal and abnormal conditions will be such that the plant is operated in a safe and efficient manner.”

ANSI/ANS 3.1-1978 requires the person responsible for QA to have at least six years experience in the field of QA or operations supervisory experience with at least one year nuclear power plant experience in the overall implementation of the QA program (which is to be obtained within the QA organization). Although the standard does not specify minimum education requirements for the position, the standard allows some limited credit for technical or academic training to meet the experience requirements.

Candidates that do not meet the above minimum requirements may be considered for the position based upon a combination of factors as discussed in section 4.1 of the 1978 standard on a case-by-case basis. Later versions of industry standards may be considered for this evaluation. For example, ANSI/ANS 3.1-1993 requires fewer years of related experience for the position but requires the person to have a baccalaureate in engineering or related science and to have management and supervisory skills in the areas of leadership, interpersonal communication, management responsibilities and limits, motivation of personnel, problem analysis and decision making, and administrative policies and procedures. Such education, skills, and experiences are examples of factors to be considered in selecting a candidate that does not fully meet the minimum standards of ANSI/ANS 3.1-1978. Since the evaluation criteria is not standardized, the basis for concluding that the candidate has the required combination of education, experience, health, and skills commensurate with their functional level of responsibility must be documented and approved by senior management.

Question 1.0.3

Entergy's proposed revision to the QAPM will state:

Entergy is committed to Sections 1 - 4 of ANSI/ANS 3.1-1978 with following clarifications and exceptions.

Qualification requirements for personnel shall meet ANSI/ANS 3.1-1978 except the following:

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2, 1987.*
- b. Managers required to hold an SRO license are specified in the applicable unit's Technical Specifications.*
- c. Licensed Operators shall be qualified in accordance with the requirements of 10 CFR 55.*

Entergy's proposed revisions to the affected plants' TS states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Entergy QAPM." Please provide clarification on the extent of use of ANSI/ANS 3.1-1978.

Response:

The qualification standards of ANSI/ANS 3.1-1978 will be applied fleet-wide to the extent of the QAPM commitment. The following sections of the 1978 standard are excepted.

- Entergy is taking exception to section 4.2.2, Operations Manager, to be consistent with the current plant TS. Section 4.2.2 of ANSI/ANS 3.1-1978 states that the operations manager shall hold a Senior Reactor Operator's license. The plants' Technical Specifications (TS), on the other hand, require either the operations manager or an operations middle manager (e.g., an assistant operations manager) to hold an operator's license. This is not a new exception, but rather more accurately reflects an exception already approved by the NRC staff in the plants' TS.
- Entergy is taking exception to section 4.4.4, Radiation Protection. The responsible group leader for radiation protection (i.e., the Radiation Protection Manager) shall meet the upgraded standards of Regulatory Guide 1.8, Revision 2, 1987.
- Entergy is taking exception to sections 4.3.1, Supervisors Requiring NRC Licenses, and 4.5.1, Operators. Licensed personnel will be qualified in accordance with the requirements of 10 CFR 55. Note that this also is not a new exception. The currently approved QAPM states that licensed operators are covered under 10 CFR 55 rather than ANSI/ANS 3.1-1978.
- Entergy is taking exception to section 5, Training. Currently, QAPM Section A of Table 1 describes the commitments for qualification requirements but does not address

specific commitments to training standards. Commitments to training standards are typically found in the individual plant's licensing documents such as the Final Safety Analysis Report (FSAR) or the Technical Requirements Manual (TRM). Earlier versions of most TS and the standard TS NUREGs separated staff qualifications requirements from training requirements in the Administrative Controls section. The training requirements were later relocated from the TS.

After additional consideration of the above, Entergy believes that it would be in the best interest of fleet standardization and commitment clarity to provide a single point of reference for a Training Program commitment in the QAPM. The response to question 1.0.6 provides a requested change that adds a commitment for Entergy's training programs.

Question 1.0.4

Entergy QAPM, Table 1, Regulatory Commitments, page 21 commits to Regulatory Guide 1.8, Revision 1, dated September 1975. The Clarification/Exception of this section does not clearly state the affected sections of the standard requiring the clarification or exception. Please provide clarification by identifying the clarifications and exceptions taken from Regulatory Commitments as in other sections of Table 1.

Response:

RG 1.8, Revision 1, Section C, "Regulatory Position" states that the criteria for the selection and training of nuclear power plant personnel contained in ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," are generally acceptable and provide an adequate basis for the selection and training of nuclear power plant personnel except for the position Supervisor-Radiation Protection (also referred to as the Radiation Protection Manager or RPM). Section C provides specific qualification requirements for the RPM. The QAPM takes exception to all of Section C in that Entergy's qualification requirements will meet ANSI/ANS 3.1-1978 except for the specified exceptions.

As discussed in the response to NRC question 1.0.1, Entergy proposes to change the word "General" in section A.1 of Table 1 to "Section C" to clarify which part of the RG is being excepted. This is an editorial change for clarification purposes and does not change the scope or justification of Entergy's request. A revised markup of the proposed changes to the QAPM is attached to clarify the exception to Section C of RG 1.8, Revision 1.

Question 1.0.5

10 CFR 50.54(a)(4) states in part that, "Changes to the quality assurance program description that do reduce the commitments must be submitted to the Nuclear Regulatory Commission (NRC) and receive NRC approval prior to implementation." The regulation also states, "the submittal of a change to quality assurance program description must include all pages affected by that change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of appendix B of this part and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC (the letter

need not provide the basis for changes that correct spelling, punctuation, or editorial items).” The use of ANSI/ANS 3.1-1978 is not approved by the NRC for Fitzpatrick, Palisades, Pilgrim and Vermont Yankee. Entergy’s current submittal does not provide an evaluation of this standard and reasons for change. Please provide an evaluation on the acceptability of a quality assurance alternative that deviates from the earlier NRC approved N18.1 -1971 standard.

Response:

The current QAPM does not specifically require compliance with the N18.1-1971 standard for personnel qualifications at any Entergy plant. Compliance with the N18.1-1971 standard is required by the TS for Fitzpatrick, Palisades, Pilgrim and Vermont Yankee. Thus the evaluation of the proposed change from the 1971 standard to the 1978 standard was provided in Enclosure 2 of Entergy’s request as a change to the TS (see section 3.1.2 of Enclosure 2 to Reference 1). As discussed in Reference 1, this inconsistency between the QAPM and TS has caused some confusion internal to Entergy and with NRC inspectors as the plants must meet both the QAPM commitments and TS requirements.

The current verbiage of the QAPM recognizes that plants may have to meet more restrictive requirements than the 1978 standard to remain compliant with their TS. These exceptions (e.g., qualification requirements for the RPM) are identified in the plant TS as either an exception to ANSI/ANS 3.1-1978 or as an exception to N18.1-1971. The current QAPM clarification is that where the plant TS specify more restrictive requirements, those requirements must be met.

Since the 1971 standard is being replaced in the TS for the four plants by reference to the 1978 standard and the exceptions are being relocated from the TS to the QAPM, the QAPM no longer needs to reference the TS more restrictive requirements.

Question 1.0.6

Entergy’s QAPM, Revision 21, Table 1, Regulatory Commitments states that Entergy is committed to Regulatory Guide 1.8, Revision 1, dated 1975. The QAPM, Revision 21, Clarifications/Exception section states, “Qualification requirements for personnel, other than Licensed Operators covered under 10 CFR 55, shall meet ANSI/ANS 3.1 1978 except for positions where an exception to either ANSI/ANS 3.1-1978 or N18.1 -1971 is stated in the applicable unit’s Technical Specifications. If an exception exists for a given position, the applicable unit’s Technical Specification qualification requirements shall apply.” Entergy is proposing to change the QAPM to the following:

Entergy is committed to Sections 1 - 4 of ANSI/ANS 3.1-1978 with following clarifications and exceptions.

Qualification requirements for personnel shall meet ANSI/ANS 3.1-1978 except the following:

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2, 1987.
- b. Managers required to hold an SRO license are specified in the applicable unit's Technical Specifications.

- c. Licensed Operators shall be qualified in accordance with the requirements of 10 CFR 55.

10 CFR 50.120 provides for a system approach to training in accordance with 10 CFR 55.4. The requirements are for a non-licensed operator, shift supervisor, shift technical advisor, instrument and control technician, electrical maintenance personnel, mechanical maintenance personnel, radiological protection technician, chemistry technician, engineering support personnel. Please provide clarification on how Entergy's QAPM will address training for managers, supervisors, and general personnel.

Response:

As discussed in the response to NRC question 1.0.3, while the current QAPM addresses qualification commitments, it does not clearly specify training program commitments. Other plant documents such as the Final Safety Analysis Report (FSAR) or Technical Requirements Manual (TRM) provide some discussion of the plant's training programs. Entergy believes that it would be in the best interest of fleet standardization and commitment clarity to provide a single point of reference for a Training Program commitment in the QAPM that ensures applicable staff identified in the ANSI standard that are not covered by 10 CFR 50.120 or 10 CFR 55 are properly trained.

Earlier versions of most TS and the standard TS NUREGs separated staff qualifications requirements from training requirements. The training requirements were later relocated from the TS to plant specific documents for which the wording may vary by plant. For fleet standardization, Entergy proposes to modify the proposed QAPM exception to Section 5 of ANSI/ANS 3.1-1978 to specifically address training commitments as follows:

5. ANSI/ANS 3.1 Section 5 Entergy will maintain a training program for the unit staff that meets the applicable regulations and either a) is accredited by the National Nuclear Accrediting Board (NNAB) or b) meets the standards of section 5 of ANSI/ANS 3.1-1978.

Attachment 2 to this letter provides a revised markup of the proposed QAPM changes to incorporate the above change. Attachment 2 replaces pages 2 and 3 of Attachment 1 to Enclosure 1 of Entergy's initial request letter (Reference 1).

Evaluation of Change:

The above commitment allows certain training programs to be accredited by the NNAB as part of the training accreditation program developed by the Institute of Nuclear Power Operators (INPO) in lieu of meeting the standards of section 5 of ANSI/ANS 3.1-1978. Typical accredited training programs include training for: licensed and non-licensed operators (initial and requalification programs), professional technical personnel (engineering support personnel), technicians, and maintenance personnel. Programs which are not accredited by the NNAB such

as general employee training and supervisor training will continue to meet the standards of section 5 of ANSI/ANS 3.1-1978. In addition, a systematic approach to training is applied to the training programs, including non-accredited training programs.

The accreditation alternative to the ANSI requirements is consistent with the NRC's previous positions on the adequacy of operator training programs accredited by the NNAB. On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel (50 FR 11147), which endorsed the training accreditation program developed by the Institute of Nuclear Power Operators (INPO), in association with its NANT. The NRC has documented approval and acceptance of NANT guidelines in RIS 2001-01, "Eligibility of Operator License Applicants," and NUREG-1021, Revision 9, Supp 1 "Operator Licensing Examination Standards For Power Reactors." These documents state that a facility licensee's training program would be considered approved by the NRC when it is accredited by the NNAB and the NANT guidelines. Additionally, in NRC Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," and NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses", the NRC indicated it would accept a licensee's licensed operator training program if it is accredited and based on a systems approach to training. This accreditation obviates the need to conform to the guidance of either ANSI N18.1-1971 or ANSI/ANS 3.1-1978. NUREG-1262 notes that ANSI N18.1-1971 and ANSI/ANS 3.1-1978 may be superseded by INPO accreditation in accordance with the revised 10 CFR 55, and that licensees may submit a request to the NRC for an administrative change to their TS to revise or delete, as appropriate, the TS requirements which have been superseded. Entergy's proposed change to the QAPM is consistent with that staff position.

The NNAB accredited training programs for non-licensed personnel will likewise properly prepare applicable personnel for their assignments and ensure qualification standards are met in accordance with the intent of section 5.3 of ANSI/ANS 3.1-1978. The commitment for the accredited programs is an enhancement to the current standards of ANSI/ANS 3.1-1978 as the accreditation standards are more rigorous.

REFERENCES:

1. Request for Approval of Changes to the Entergy Quality Assurance Program Manual (QAPM) and Associated Plant Technical Specifications Regarding Staff Qualifications, dated December 13, 2011 (ADAMS Accession Number ML11356A278)
2. Letter dated November 6, 1998 from J. N. Hannon, USNRC to M.R. Kansler, EOI, "Consolidation of Quality assurance (QA) Programs"

Attachment 2

INSERTS FOR QAPM PAGE MARKUPS

INSERT 1:

Entergy is committed to Sections 1 – 4 of ANSI/ANS 3.1-1978 with following clarifications and exceptions.

Qualification requirements for personnel shall meet ANSI/ANS 3.1-1978 except the following:

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2, 1987.
- b. Managers required to hold an SRO license are specified in the applicable unit's Technical Specifications.
- c. Licensed Operators shall be qualified in accordance with the requirements of 10 CFR 55.

INSERT 2:

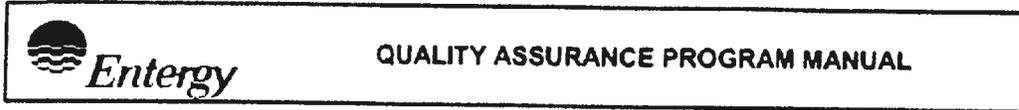
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| 3. ANSI/ANS 3.1 Section 4 | Individuals assigned to professional-technical comparable positions shall have the authority and specified qualifications to accomplish the functional responsibilities of the position. |
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INSERT 3:

- | | |
|-------------------------------|---|
| 4. ANSI/ANS 3.1 Section 4.4.5 | Individuals who do not possess the formal education and minimum experience requirements for the manager responsible for quality assurance should not be eliminated automatically when other factors provide sufficient demonstration of their abilities. These other factor are evaluated on a case-by-case basis and approved and documented by senior management. |
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INSERT 4:

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| 5. ANSI/ANS 3.1 Section 5 | Entergy will maintain a training program for the unit staff that meets the applicable regulations and either a) is accredited by the National Nuclear Accrediting Board (NNAB) or b) meets the standards of section 5 of ANSI/ANS 3.1-1978. |
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**Table 1
Regulatory Commitments**

A. Regulatory Guide 1.8 Revision 1, dated September 1975

	Clarification/Exception
1. <i>Section C Generate</i>	Qualification requirements for personnel, other than Licensed Operators covered under 10CFR55, shall meet ANS/ANS 3.1-1978 except for positions where an exception to either ANS/ANS 3.1-1978 or N18.1-1971 is stated in the applicable unit's Technical Specifications. If an exception exists for a given position, the applicable unit's Technical Specification qualification requirements shall apply.

INSERT 1

Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.

2. General

The following qualifications may be considered equivalent to a bachelor's degree:

- a. 4 years of post secondary schooling in science or engineering,
- b. 4 years of applied experience at a nuclear facility in the area for which qualification is sought,
- c. 4 years of operational or technical experience/training in nuclear power, or
- d. any combination of the above totaling 4 years.

Years of experience used to meet the education requirements as allowed by this exception shall not be used to also meet the experience requirements.

INSERT 2

INSERT 3

INSERT 4