

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

MAR 30 1993

ST-HL-AE-4342

File No.: G32.01.09

10CFR50

Mr. James L. Milhoan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

South Texas Project
Units 1 and 2

Docket Nos. STN 50-498, STN 50-499

Report Regarding Nuclear Safety Review Board Initiatives

Reference: Correspondence from D. P. Hall, HL&P, to
James L. Milhoan, NRC, dated January 14, 1993, "First
Report Regarding HL&P Performance Initiatives"
(ST-HL-AE-4295)

Dear Mr. Milhoan:

In the referenced correspondence, Houston Lighting & Power (HL&P) provided a progress report on the activities undertaken to improve performance at STP. As a follow-up on the performance initiatives of the Nuclear Safety Review Board (NSRB), the NSRB has established four standing committees for providing review assistance to the NSRB. The purpose of these standing committees is to allow NSRB to perform effective high level oversight of safety issues and to conduct its business efficiently. These standing committees are expected to provide a more focused overview of specific areas of Nuclear Group performance, including the area of radiological controls which is undergoing a major transition to implement the new 10CFR20 changes.

Attachment 1 further describes the charter of the NSRB, the current membership, NSRB's standing committee structure, and the implementation status of these committees. Attachment 2 provides a brief description of the major areas of expertise of the current NSRB members. Some of the issues identified during 1992 by the NSRB for highlights to the Group Vice President, Nuclear are described in Attachment 3.

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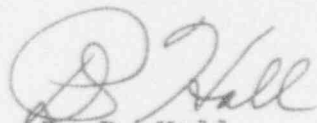
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HL&P considers the NSRB to be one of its vital resources for safe and reliable operation. We will update the NRC periodically regarding progress made in implementing the NSRB initiatives and their effectiveness.

If you have any questions, please call me at (512) 972-8434 or (713) 229-7253.



D. P. Hall
Group Vice President,
Nuclear

MKC/nl

Attachments

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ATTACHMENT 1
ST-HL-AE-4342

NUCLEAR SAFETY REVIEW BOARD

Charter

STP's offsite review group, the Nuclear Safety Review Board (NSRB) reviews station performance for safety and reliability issues and progress. The NSRB is an advisory group to the executive in charge of the nuclear program. The NSRB is responsible for conducting independent reviews and audits of potentially significant activities that relate to nuclear safety and advising the Group Vice President, Nuclear of the results of their activities. Nuclear Group Policy describes the responsibility of the NSRB.

Membership

Currently the NSRB is composed of five senior level managers from within the HL&P nuclear group and three recognized industry consultants with expertise in plant operations, engineering and radiation protection. The NSRB is chaired by one of these independent consultants. A short biography of each member (noted as consultant or utility employee) is provided in the Attachment showing major areas of expertise and the number of years of nuclear experience.

NSRB Accomplishments

During 1992 the NSRB had eleven meetings. At these meetings, the Board reviewed current plant problems and events as well as Technical Specification mandated items. To enhance its ability to make the NSRB concerns more visible, the Board routinely provides to the Group Vice President, Nuclear the meeting highlights after each meeting. Examples of some 1992 highlights for the Group Vice President are included in Attachment 3.

To allow integration of outstanding significant issues discussed at previous meetings and to remain focused on them, the Board routinely reviews the NSRB Watch List containing the top ten active concerns of the NSRB.

Use Of Standing Committees

PURPOSE: To enable NSRB to perform effective high level oversight of safety issues and to conduct its business efficiently, the NSRB has established four Standing Committees (Operations & Maintenance, Radiological, Engineering, and Quality & Security). These committees have been structured to ensure objectivity, openness and field orientation.

NUCLEAR SAFETY REVIEW BOARD

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SCOPE: Each standing committee will provide a more focused overview of specific areas of Nuclear Group operation as well as review the Technical Specification mandated items in their areas of responsibility. The standing committees report to the NSRB. The Chairmen of the standing committees provide highlights to the NSRB Chairman after each meeting and reports to the full NSRB about the committee activities at each NSRB meeting. The NSRB Chairman, after each NSRB meeting, provides highlights to the Group VP, Nuclear. The minutes of NSRB and standing committee meetings are provided to NSRB members, the Group VP, Nuclear, and cognizant management and staff.

STANDING COMMITTEES:

Radiological: This standing committee provides overview in the areas of radiological controls, chemistry, radwaste, environmental controls, emergency preparedness including training in these areas. It also routinely reviews the Technical Specification mandated items related to its overview areas.

Engineering: This standing committee provides overview in the areas of configuration management, engineering assurance, life cycle engineering, modification and modernization programs and engineering support to operations including training associated with the engineering areas. It also routinely reviews the Technical Specification mandated items related to its overview areas.

Operations and Maintenance: This standing committee provides overview in the areas of operations, maintenance and material readiness, including training in these areas. It also routinely reviews the Technical Specification mandated items related to its overview areas.

Quality and Security: This standing committee provides overview of total quality culture and nuclear security issues at STP. It also routinely reviews the Technical Specification mandated items related to its overview areas and assures that the audit functions required by the Technical Specification are performed effectively.

CURRENT STATUS: Each standing committee held its first organizational meeting on November 11, 1992. They held their first business meetings in January, 1993. A special subcommittee met in February (in lieu of a full NSRB meeting) to address the auxiliary feedwater turbine issue. In March meetings of the full NSRB and two of its standing committees were held.

ATTACHMENT 2
NSRB MEMBERSHIP EXPERIENCE
(Page 1 of 1)

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MEMBER TYPE	MAJOR AREAS OF EXPERTISE	APPROX. YEARS OF NUCLEAR EXPERIENCE
Consultant #1 - Chairman	Engineering, Operations, Radiological Safety, Quality	More than 30 years. Serves on the Corporate Nuclear Safety Review Boards for fourteen different nuclear units.
Utility Employee - Vice Chairman	Engineering, Operations, Radiological Safety	More than 21 years. Currently V.P., Nuclear Engineering and formerly a Vice President with INPO.
Utility Employee - Member	Operations, Engineering, Chemistry & Radiochemistry, Emergency Preparedness, Environmental Impact	More than 24 years. Currently V.P. Nuclear Generation and previously was the STP Plant Manager.
Utility Employee - Member	Engineering, Training	More than 23 years. Currently General Manager, Nuclear Assurance and formerly a senior reactor physicist at Yankee Atomic Electric Company.
Utility Employee - Member	Operations, Engineering	More than 18 years. Currently Plant Manager and previously a nuclear engineer with TVA.
Utility Employee - Member	Operations, Engineering, Radiological Safety	More than 17 years. Currently General Manager Licensing and previously an outage management manager and startup manager at Arizona Public Service.
Consultant #2	Operations, Radiological Safety, Training, Emergency Preparedness	More than 30 years. Retired in Dec. 1990 from GPU, Nuclear as VP & Director, Three Mile Island Unit 1. Serves on various nuclear oversight groups.
Consultant #3	Operations, Engineering, Radiation Protection, Emergency Preparedness, Environmental Impact	More than 35 years. Retired in Dec 1990 from GPU System. Held positions of VP & Director Site Services Division, Radiological and Environmental Control Division, and others.

ATTACHMENT 3
SAMPLE OF 1992 NSRB HIGHLIGHTS
(Page 1 of 4)

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Issue	How Identified	Status
Material Condition improvement campaign not bringing the desired result.	The Board noted this issue while reviewing the monthly station reports and INPO evaluation.	This issue is an NSRB Watch List Issue. Improving Material condition is a specific 1993 Master Operating Plan (MOP) goal. The NSRB expects to hear from the station management further on this issue.
Station Overtime (OT).	This is a long standing observation of the NSRB. NSRB developed this concern from a report of the Plant Manager, from review of Station Overtime (OT), and conversation with Station employees during plant tours.	This is an NSRB Watch List Issue. NSRB is monitoring the effectiveness of station measures in this regard. An administrative Policy (AP03-11) has been developed. NSRB will monitor implementation. 1993 Station MOP has an OT performance goal (#41).
Expected Plant Response to uncomplicated reactor trip.	While reviewing the trip reports and the issue of routinely closing the MSIVs following a trip, the NSRB raised this issue. The NSRB was concerned that operators have not been provided with a clear picture of what the plant response ought to be during an uncomplicated trip.	Plant Manager and General Manager, Engineering coordinated the effort to resolve this issue and briefed the Board at meeting #92-11. During 1RE04 a modification was added to help control of the post trip cool down rate. This same modification will be installed during 2RE03. Station management will report to NSRB if the results of post modification testing are not acceptable.
Scope of Modification Control Process.	This issue surfaced during review of a Station incident. One of the causal factors had to do with a temporary system change that appeared to have not been controlled properly.	Station management briefed the board on the measures taken to address this issue. Station decided to adopt a broader definition of temporary modification.

ATTACHMENT 3
SAMPLE OF 1992 NSRB HIGHLIGHTS
(Page 2 of 4)

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Issue	How Identified	Status
Station effectiveness in bringing the technical and regulatory knowledge to bear on Station operations.	This issue surfaced during NSRB's review of TS Containment Integrity violation (LER 1-92-002) and LER 1-92-001 involving essential chiller operation.	Station management briefed the Board on the actions taken to address this issue. Operator training program will be enhanced to include more information regarding the general design criteria and the safety analysis basis.
How the focus on audit activities can be redirected to recognize problem areas before they are identified by outside organizations or before they become a significant issue at STP.	This issue surfaced during Board's review of Maintenance audit reports. While the material condition of the plant continues to be a key issue, the audit report did not make this point with the degree of clarity needed.	Quality Assurance (QA) is taking initiatives to address this issue. QA 1993 initiatives will be reviewed by the quality and security standing committee. NSRB will continue to monitor this issue.
Clarity of post trip review documentation with regard to the disposition of abnormalities experienced during the trip including the criteria for restart constraints.	The Board expressed this concern while reviewing post trip review reports (#2-020, 2-021 & 1-020).	The Plant Manager said that he will advise the PORC and the Trip Prevention Team Task Force to address this issue. The NSRB will monitor effectiveness by its review of future post trip reports.
Supervisory effectiveness.	While reviewing ISEG reports the NSRB was concerned at the number of events having supervisory effectiveness as an underlying causal factor.	This item is an NSRB Watch List issue and is monitored by the NSRB. A Basic Supervisory Skills Training Program was completed by more than 180 people during 1992.

ATTACHMENT 3
SAMPLE OF 1992 NSRB HIGHLIGHTS
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Issue	How Identified	Status
Not promptly reporting to appropriate management levels the incident in which all four Auxiliary Feedwater flow control valves remained closed for four days.	NSRB identified this incident as a result of its review of Level 2 SPR (SPR 920101).	Station management subsequently reported this event to the NRC as a voluntary LER.
The condition of the Neutralization Basin area may be an industrial safety hazard.	During plant tour by a NSRB member.	Station management is improving the condition of the Neutralization Basin. NSRB will monitor the condition via follow-up tours.
Ability of the Emergency Response Organization (ERO) to meet regulatory commitments on timely staff augmentation.	NSRB raised this issue while reviewing the results of Emergency Preparedness audit reports and NRC IRs 92-09 and 92-10.	Station management is addressing this issue currently. NSRB's radiological standing committee will further monitor this issue and advise NSRB.
Maintenance training accreditation issues.	Plant Manager alerted the Board about this issue which was identified by INPO.	Station management is taking action. The Board will be advised of the corrective measures including potential generic implications. Station 1993 milestone plan includes resolution of this issue.
Locked valve program may not be based on rational, bounded, and understandable criteria.	While reviewing a QA DR (#92-016) the Board raised this concern.	Operations and Engineering will work together on this issue and report back to the Board.
The Board identified a potential design issue related to resetting the reactor scram breakers in order to "re-arm" the Safety Injection actuation.	The Board raised this issue while reviewing SPR 92-0335.	Station management is looking into the rationale for association of resetting Safety Injection with the reactor trip breaker.

ATTACHMENT 3
SAMPLE OF 1992 NSRB HIGHLIGHTS
(Page 4 of 4)

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Issue	How Identified	Status
Efforts to resolve Emergency Diesel generator (EDG) problems are not yielding positive results.	The Board noted this issue while reviewing several special reports involving EDG failures.	This is an NSRB Watch List issue. Station management will review this issue from a fresh perspective.
Concerning Station's plan for addressing industry concerns on Solenoid Operated Valves (SOV) there is a concern as to whether the priority is on the most risk significant valves addressed earliest.	The board raised this issue while reviewing STP's plan to address NRC Generic Letter 91-15.	Station management will provide a follow-up report.
Board raised a question as to what is being done to reduce the volume of liquid effluent release.	The Board raised this issue while reviewing the semi-annual effluent release report.	A task force has been established to address this issue. The 1993 MOP is also tracking this issue. NSRB's radiology standing committee will further monitor the status and report to the NSRB.
The issue of lack of credibility between shift and operations management due to ineffective communication.	The Plant Manager advised the Board during his report.	Plant Manager conducted seminars with the Plant Manager's Supervisors in this regard.
Issue of polar crane and refueling machine problems experienced during 1RE04.	Documented as a result of a backshift tour conducted by an NSRB member.	1RE04 outage critique addresses this issue. NSRB's operations and maintenance standing committee will look further into this issue and report to the NSRB.
Implications of Fort Calhoun loss of coolant incident of July 3, 1992 on STP.	The Board asked this question while reviewing the industry incidents.	The Plant Manager will provide a coordinated Station response to the NSRB.