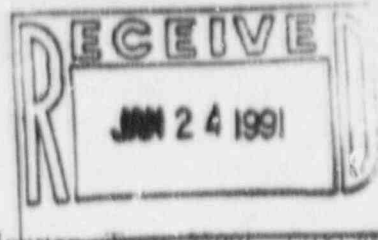


# The Light company

Houston Lighting & Power



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January 18, 1991

ST-HL-AE-3662

File No.: G02.04

R. D. Martin, Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

South Texas Project Electric Generating Station  
Response to Inspection Report 50-498/90-29  
and 50-499/90-29 Balance of Plant Team Inspection

This letter is submitted with respect to the NRC inspection of operation, maintenance and modification of Balance of Plant (BOP) systems and components conducted at STPEGS in the period October 9-18, 1990. The report of the inspection concluded that these activities were effective. No violations or deviations were identified, and the inspectors made positive comments about many of the activities, including the issuance of System Engineer Guidelines and the additional maintenance personnel brought in to reduce the backlog of outstanding maintenance work items. The inspection report expressed agreement with HL&P that these efforts should improve the material condition of the plant.

The report also included observations regarding employee work attitudes which were based on interviews. It is noted with pleasure that the NRC report states a large majority of the personnel indicated they were aware of overall improvement in the areas of concern. We understand that the reported comments were intended to identify areas for possible management attention, and are not directly associated with any specific regulatory requirements. At the time of the inspection, several initiatives were underway which were intended to adjust the work environment from construction and testing to operation and maintenance.

The STPEGS Operational Improvement Plan (OIP), which HL&P began to formulate in August 1990, was reviewed with you on December 13, 1990. The OIP includes steps to make STPEGS a more attractive place to work, encourages positive employee attitudes and establishes priorities for their implementation. In light of

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the observations in the inspection report, it is helpful to summarize for the record certain of these activities and their present status:

1. A Task Force, created last Fall, has developed and is implementing a program aimed at improving the quality of work instructions, planning and spare parts availability. Additional resources have been applied to decrease the maintenance backlog and a station-wide priority system has been developed to minimize the pressure of conflicting work requirements.
2. The industrial safety record at STPEGS is improving. In 1990, our record was very close to the industry average established by INPO. The STPEGS staff has been effective in identifying and resolving problems including those identified in the inspection report. The results reflect the effort. The Nuclear Generation Departments completed one million manhours without a lost time accident in 1990; in 1990, the Maintenance Department worked all year without such an accident. To further improve working conditions, HL&P is expediting measures to improve access to plant equipment. Although construction of these access aids had not been completed at the time of the BOP inspection, eleven permanent platforms and two ladders have since been completed.
3. HL&P management has prudently addressed the potential for medical emergencies at STPEGS. There are state certified emergency care personnel on each shift, including weekends and nights, who are available in the event of an industrial accident. The medical staffing levels at STPEGS exceed the federal requirements and have adequately handled medical emergencies at the plant. When necessary, these levels are increased during periods of augmented plant staffing levels, such as during plant outages.
4. Operator staffing and overtime issues are being addressed by introducing entry level personnel into the operator training "pipeline." As of December 1990, there are nine trainees in this program with an additional 13 entry level personnel to be hired in 1991. Also, 14 operators recently received NRC licenses.

5. The OIP also includes a team building and organizational development program designed to improve overall personnel performance through more effective teamwork and better communication between groups.

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



D. P. Hall  
Group Vice President  
Nuclear

AKK/sgs

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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