

The Light company

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

July 19, 1991

ST-HL-AE-3815
File No.: G09.08
10CFR50.54(t)

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

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Postponement of Emergency Preparedness Program Audit

Houston Lighting & Power Company (HL&P) intends to postpone the 1991 audit of the South Texas Project Electric Generating Station (STPEGS) Emergency Preparedness Program (EPP). The audit is to be postponed approximately three months beyond the current schedule of September 1991.

Annual reviews of the EPP are required by 10CFR50.54(t) which states that HL&P "shall provide for a review of its emergency preparedness program at least every 12 months by persons who have no direct responsibility for implementation of the emergency preparedness program". The audit period will be extended to fifteen months only for the 1991 audit - future audits are expected to occur at nominal twelve month intervals.

This postponement is justified for the following reasons:

- STPEGS is concluding a major enhancement of the EPP which is to become effective in August, 1991. Accordingly, annual retraining of all but certain key Emergency Response Organization personnel has been delayed so that training will be in accordance with the enhanced EPP.
- Performance of an audit in September will not allow sufficient time for implementation of the enhanced EPP to accommodate an effective evaluation. Postponement until December will enable an evaluation of four months' implementation of enhanced EPP activity in addition to the eleven months governed by the current EPP since the 1990 audit.
- Independent review of ongoing EPP activities has been performed since the 1990 EPP audit.

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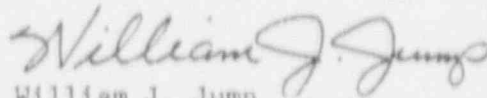
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Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-3815
File No.: G09.08
Page 2

Postponement of this audit will not result in a decrease in the overall effectiveness of Emergency Preparedness at STPEGS, nor will it result in a decrease in the effectiveness of Quality Assurance/independent review of EPP activities to verify compliance with 10CFR50.47(b) and 10CFR50, Appendix E. Independent review of EPP activities will continue to meet the standards of 10CFR50.54(t).

If you have any questions on this matter, please contact
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