

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

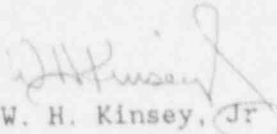
June 14, 1991
ST-HL-AE-3788
File No.: G02.04
10CFR 2.201

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

South Texas Project Electric Generating Station
Unit 1 and 2
Docket No. STN 50-498 and 50-499
Reply to Notice of Violation 9110-01
Failure to Provide Initial Supervisory Training
to Contractor Supervisors as Required by 10CFR26.22

Houston Lighting & Power has reviewed the Notice of Violation issued as a result of NRC Inspection Report 91-10 dated May 17, 1991, and submits the attached reply.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628.


W. H. Kinsey, Jr.
Vice President,
Nuclear Generation

RAD/amp

Attachment: Reply to Notice of Violation 9110-01

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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cc:

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Revised 01/29/91

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)

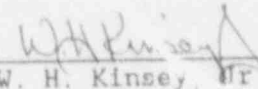
Houston Lighting & Power)
Company, et al.,)

South Texas Project)
Unit 1 and 2)

Docket Nos. 50-498
50-499

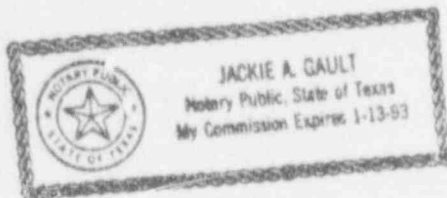
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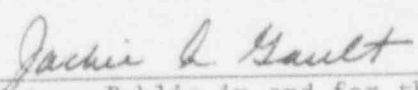
W. H. Kinsey, Jr. being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to NRC Notice of Violation 9110-01 "Failure to Provide Initial Supervisory Training to Contractor Supervisors as Required by 10CFR26.22"; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.


W. H. Kinsey, Jr.
Vice President,
Nuclear Generation

STATE OF TEXAS)
)
)

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 14TH day of JUNE, 1991.




Notary Public in and for the
State of Texas

I. Statement of Violation:

10CFR26.22(c) requires, in part, that initial training must be completed prior to assignment of supervisory duties within the scope of Part 26. Additionally, 10CFR26.23, requires, in part, that all contractor and vendor personnel performing activities within the scope of Part 26 be subject to the licensee's program if they are not in another approved fitness-for-duty program.

Contrary to the above, during 1990 the licensee failed to provide initial supervisory training to some contractor supervisors assigned duties that fall within the scope of this part.

This is a Severity Level IV violation. (Supplement VII) (498/9110-01; 499/9110-01)

II. Houston Lighting & Power Position:

HL&P concurs that this violation occurred.

III. Reason for Violation:

The cause of the violation was the misinterpretation of the 10CFR26.22(c) rule. The Fitness for Duty policy allowed contractor personnel designated as supervisors to be granted unescorted access prior to completing the required supervisory training. The policy allowed the training to be completed within three months of initial assignment of duties. Additionally, the methods used to comply with 10CFR26 supervisory training requirements were not strictly proceduralized allowing for less rigorous monitoring and implementation of compliance.

IV. Corrective Action:

1. A review was conducted of both contractor and utility supervisors and managers to determine if the required initial and refresher training for supervisory personnel was completed. Ten (10) personnel were identified where initial supervisory training was not conducted as required. One individual was also identified in which the refresher training was not completed as required. These individuals have now received the required supervisory training.
2. The form to request unescorted access has been revised to ensure supervisory personnel complete the required training prior to being granted unescorted access.
3. The Fitness for Duty and Personnel Processing procedures will be revised to ensure supervisors and newly appointed supervisors receive supervisor training as required by 10CFR26.22(c) and to provide more specific procedural steps for compliance with the rule requirements. This action will be completed by August 1, 1991.

V. Date of Full Compliance:

HL&P is in full compliance at this time.