

# The Light company

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

August 14, 1995  
ST-HL-AE-5142  
File No.:G09.19

Mr. Ashok C. Thadani  
Associate Director for Technical Review  
Office Of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498 & STN 50-499  
Control Of Audit Frequencies

Dear Mr. Thadani:

In telephone conversations on August 1st and 14th, 1995, Mr. Lee Spessard of your staff raised a question about the control of certain audit frequencies. The question relates to the Technical Specification (TS) changes approved by the Nuclear Regulatory Commission (NRC) on December 27, 1993, in response to the proposal submitted by Houston Lighting & Power Company (HL&P) on October 21, 1993.

This subject TS change removed from TS 6.5.2.8, the prescriptive frequency of the required audits. The submittal included justification for the change and stated our intention to submit an Operations Quality Assurance Plan (OQAP) change removing the same requirement. We stated that audit frequencies and schedule would be controlled in our Audit Plan process. The question raised by your staff is why these prescriptive audit frequencies should not be added to the OQAP, thereby requiring that changes be subject to the requirements of 10 CFR 50.54(a).

HL&P has considered this question and has concluded that the application of the restrictions of §50.54(a) to the audit frequencies would reduce the effectiveness of the QA program by reducing the ability of HL&P management to adjust audit schedules and resource allocation on a real time basis in response to empirical data and performance history. HL&P,

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in preparation for this TS change, developed a process for determining audit frequencies involving review of a number of inputs, including corrective action process and trending, QA surveillances, inspections and assessments, and effectiveness review of previous corrective actions. This review is performed by Nuclear Assurance supervision and approved by the Director of Quality and reviewed by the General Manager, Nuclear Assurance and Licensing and the Nuclear Safety Review Board. This review and decisions made, including justifications, are thoroughly documented.

In HL&P's view, the current NRC approved system of controlling audit scheduling and frequency at the South Texas Project is consistent with published NRC regulatory requirements and applicable guidance. The Standard Review Plan (SRP) does not require that audit frequencies be specified in the QA Program Description. Instead, the SRP states that this information be contained in an audit plan. The SRP also states that "audits should be regularly scheduled based on the status and safety importance of the activities" to be audited.

The current system also provides an adequate basis for NRC oversight of the program. The OQAP includes a commitment to meet the intent of Regulatory Guide 1.33, which contains more specific guidance on audit schedule requirements. HL&P intends that audits of safety related functions will typically be completed within a period of 2 years. Any deviations from the Regulatory Guide audit schedule requirements will be based on an analysis of the status and safety importance of Project activities. This analysis will be documented and available for NRC review.

NRC's approval of this TS change is consistent with sound performance based regulation, and represents an important element of an appropriate graded quality assurance program. Requiring that audit frequencies be specified in the OQAP would reduce the effectiveness of the QA program, and therefore would not result in a substantial increase in the overall protection of the public health and safety. Consequently, HL&P believes it is appropriate to retain the current process for controlling the audit schedule in the QA Audit Plan.

Please call me if you have any questions about this matter.

Sincerely,



L. E. Martin  
General Manager,  
Nuclear Assurance & Licensing

AHG/nl

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