

# The Light company

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

February 10, 1992

ST-HL-AE-3996  
File No.: G25  
10CFR50

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Change in Emergency Response  
Organization Minimum Staffing

Houston Lighting & Power Company (HL&P) proposes a change in the minimum staffing of the Emergency Response Organization (ERO) at the South Texas Project (STP). The proposed change revises the minimum staffing given in the Emergency Plan for Radiation Protection technicians in the area of Radiological Accident Assessment and Support of Operational Accident Assessment. The number of such personnel on-site/on-shift is to be reduced from five to two with an additional three available within 45 minutes. The revised staffing is shown on attachment 1.

In accordance with 10CFR50.54(q), HL&P requests NRC concurrence with the change.

The current Emergency Plan minimum staffing levels are based on NUREG-0654, Table B-1 (Attachment 2). In the area of radiological accident assessment and support, NUREG-0654 recommends:

- One radiation protection (RP) technician on-shift
- Four RP technicians within 30 minutes
- One individual with Senior Health Physics expertise for dose assessment within 30 minutes

Additional guidance provided in NUREG-0737, Supplement 1, states that minimum staffing requirements specified in NUREG-0654 are goals, and not strict requirements. Current STP minimum on-site staffing is the sum of the NUREG-0654 requirements, resulting in a minimum staffing of five RP technicians and one RP Technical Supervisor on-shift.

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The proposed on-shift staffing of one individual with Senior Health Physics (HP) expertise for dose assessment and two RP technicians exceeds the on-shift requirements of NUREG-0654. Additional capability is provided by:

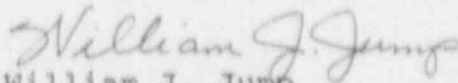
- The Senior HP individual, who will be available for initial dose assessment and determination of protective action recommendations, if necessary.
- The two on-shift Technicians qualified in radiation protection procedures will also be immediately available to do in-plant surveys to support event mitigation and other onsite surveys.
- The radiation monitoring system and simple dose assessment tools and procedures, which will aid the staff in performing these duties effectively during early stages of the event.

Three additional technicians are to be available within 45 minutes for off-site and on-site surveys. NUREG-0654 specifies a 30-minute response capability; however, the 45 minute availability was approved by the NRC in previous emergency plan revisions, and has been accepted in other positions. Due to the remote location of the plant and the additional on-shift capabilities for offsite dose assessment and protective action recommendation determination, augmentation of off-site survey support in 45 minutes will not adversely affect implementation of the emergency plan.

A review of on-shift staffing levels at other Region IV plants determined that the proposed STP on-shift minimum staffing exceeds that of the plants surveyed. Most of the Region IV plants require only one RP technician on-shift. In staff augmentation, surveyed Region IV plants require between 8 and 12 additional RP technicians and one individual with Senior HP expertise for radiological accident assessment and support, with availability between 30 and 60 minutes. Overall, the proposed staffing for radiological accident assessment and support is consistent with all other plants surveyed.

Based upon the above, HL&P requests that the NRC approve the proposed staffing change for inclusion into the Emergency Plan.

If there are any questions on this matter, please contact  
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William J. Jump  
Manager,  
Nuclear Licensing

PLW/amp

Attachments: 1) Proposed Minimum Staffing Changes  
2) NUREG-0654 Recommended Staffing

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ATTACHMENT 1  
PROPOSED MINIMUM STAFFING CHANGES  
SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION  
EMERGENCY PLAN

TABLE C-2  
Page 1 of 4  
MINIMUM STAFFING REQUIREMENTS (STPEGS)  
(Including Capability for Additional Staffing)

MAJOR FUNCTIONAL AREA	POSITION/TITLE	UNIT 1 ONSHIFT*	UNIT 2 ONSHIFT*	ONSITE ONSHIFT	AVAILABLE 45 MINUTES#	AVAILABLE 60 MINUTES#
Plant Operations and Assessment of Operational Aspects	Shift Supervisor	-	-	2###	-	-
	Unit Supervisor	1	1	-	-	-
	Reactor Operators	2	2	-	-	-
	Plant Operators	2	2	-	-	-
	Shift Technical Advisor	-	-	1**	-	-
Emergency Direction and Control *** (Emergency Director)	Shift Supervisor	1**	1**	-	-	-
	--	-	-	2	-	2
Notification/ Communications	--	-	-	-	-	1
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Director	-	-	1	-	-
	<del>RP Tech. Supv. Senior</del> HP Expertise	-	-	5	-	-
	(Dose Assessment)	-	-	2	3	4
	RP Technicians (onsite/offsite surveys)	-	-	-	-	-
	Chemistry Technician	-	-	1	-	1

REVISION <sup>13</sup> - February 15, 1989

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ATTACHMENT 2  
NUREG 0654 RECOMMENDED STAFFING

Table B-1

MINIMUM STAFFING REQUIREMENTS FOR NRC LICENSEES  
FOR NUCLEAR POWER PLANT EMERGENCIES (See B.5.)

Major Functional Area	Location	Major Tasks	Position Title or Expertise	On Shift*	Capability for Additions 30 min	60 min
Plant Operations and Assessment of Operational Aspects			Shift Supervisor (SRO)	1	--	--
			Shift Foreman (SRO)	1	--	--
			Control Room Operators	2	--	--
			Auxiliary Operators	2	--	--
Emergency Direction and Control (Emergency Coordinator)***			Shift Technical Advisor, Shift Supervisor or designated facility manager	1**	--	--
Notification/ Communication****		Notify licensee, State local and Federal personnel & maintain communication		1	1	2
Radiological Accident Assessment and Support of Operational Accident Assessment		Emergency Operations Facility (EOF) Director	Senior Manager	--	--	1
			Senior Health Physics (HP) Expertise		1	--
		Offsite Surveys		--	2	2
		Onsite (out-of-plant)		--	1	1
		In-plant surveys	HP Technicians	1	1	1
		Chemistry/Radio- chemistry	Rad/Chem Technicians	1	--	1
		Technical Support	Shift Technical Advisor Core/Thermal Hydraulics Electrical Mechanical	1 -- -- --	-- 1 1 1	-- 1 1 1
Plant System Engineering, Repair and Corrective Actions		Repair and Corrective Actions	Mechanical Maintenance/ Rad Waste Operator	1**	--	1
			Electrical Maintenance/ Instrument and Control [I&C] Technician	1** --	1 1	1 --

ATTACHMENT 2  
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