

The Light company

Houston Lighting & Power

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

February 27, 1996
ST-HL-AE-5297
File No.: G02.05
10CFR50.54(a)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2

Docket Nos. STN 50-498, STN 50-499

Additional Information Regarding Operations Quality Assurance Plan Change QA-026

- Reference 1: Letter from W. T. Cottle to the Nuclear Regulatory Commission Document Control Desk, dated December 13, 1995.
- Reference 2: Letter from Thomas P. Gwynn, Nuclear Regulatory Commission, dated January 21, 1996, and enclosure guidance from Charles E. Rossi, Office of Nuclear Reactor Regulation, dated December 21, 1992, titled Biennial Procedure Reviews.

In Reference 1, the South Texas Project notified the NRC of a change to the South Texas Project Operations Quality Assurance Plan to remove the requirement that all safety-related procedures be reviewed no less frequently than every two years. South Texas Project proposed to take credit for existing programmatic controls which accomplish the intent of the biennial procedure review and therefore determined that it is not a reduction in commitment of the Operations Quality Assurance Plan per 10CFR50.54(a). In Reference 2, the Nuclear Regulatory Commission staff asked the South Texas Project to provide additional information on the programmatic controls in place and how these controls satisfy the guidance provided in the enclosure to Reference 2. This letter is the response to those questions.

Reference 2 also stated that the deletion of the biennial procedure review is considered to be a reduction in commitment. A condition report has been generated to document the condition since the station has discontinued biennial reviews. Appropriate action will be taken based on the resolution of this issue. The South Texas Project is confident that further consideration of the programs in place at the station will enable the Nuclear Regulatory Commission to conclude that there is not a reduction in commitment to the Operations Quality Assurance Plan. Should the NRC staff continue to conclude that this change is a reduction, this letter and attachment should provide the basis for deciding that the change is appropriate.

Project Manager on Behalf of the Participants in the South Texas Project

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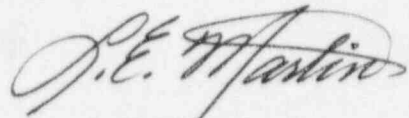
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The South Texas Project response is attached. If you have any questions, please contact Mr. R. J. Rehugler at (512) 972-7922 or me at (512) 972-8434.

Sincerely,



L. E. Martin
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RDP

c: RMS/NSC

Attachment: Response to Nuclear Regulatory Commission Questions

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SUMMARY

South Texas Project is committed to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operational)." Regulatory Guide 1.33 endorses ANSI N18.7-1976/ANS 3.2, "Administrative Controls and Quality Assurance for Operational Phase of Nuclear Power Plants," which contains a requirement that safety-related procedures be reviewed no less frequently than every two years. In lieu of performing a biennial review of safety-related procedures, South Texas Project has taken credit for programmatic controls already in place which accomplish the intent of the biennial review. These controls assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, regulatory requirements, industry experience and other conditions that may impact plant procedures. These controls ensure that the guidance in the enclosure to Reference 2 concerning Biennial Procedure Reviews is met. Discussed below are the bases for the alternative, including the programmatic controls, and a description of how the guidance contained in the enclosure to Reference 2 is addressed.

BASES

ANSI N18.7, Section 5.2.15, prescribes a biennial review of each safety-related plant procedure "to determine if changes are necessary or desirable." The biennial review is intended to ensure that plant operating experience, industry experience and recent technical information, are factored into plant procedures. South Texas Project considers the requirement to maintain procedures in an accurate and useful condition to be a dynamic process. Numerous programmatic controls have been established that accomplish the intent of the biennial review, and satisfy the guidance set forth in the enclosure to Reference 2. These controls assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, vendor recommendations, regulatory requirements, corrective actions, industry experience and other conditions that may impact plant procedures. The controls are sufficiently responsive to ensure that required procedure changes are timely and accurate, regardless of how frequently those procedures are used. Performing biennial reviews in addition to these controls is redundant, and imposes an unnecessary drain on plant resources. South Texas Project has completed two biennial review cycles since Unit 1 became operational. The results of these reviews have confirmed the effectiveness of the existing programmatic controls, and support the position that the biennial review of safety-related procedures is not necessary. The programmatic controls described below are part of dynamic processes that assure procedures are maintained in an accurate and useful condition consistent with the safety goals of the Regulatory Guide 1.33 and ANSI N18.7 requirements.

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Described below are programmatic controls in place which require an assessment of the impact on plant procedures, and a description of how South Texas Project meets the guidance listed in the enclosure to Reference 2:

○ *Corrective Action Program*

Personnel are required to identify and document conditions found to be adverse to quality, safety and plant reliability. When inadequate procedures are identified requiring corrective action, they are changed or revised. The Corrective Action Program is a comprehensive system governed by administrative controls utilized to ensure that commitments and requirements are tracked, included, and maintained in appropriate implementing procedures. Any change to source guidance is updated and evaluated against implementing procedures. The need for revision is determined and, if applicable, accomplished by the appropriate department/group.

In addition, criteria have been established to investigate events which occur at the station and are considered to be outside normal expected operation. These events include: severe or unusual plant transients, safety system malfunctions, events involving nuclear safety or plant reliability, deficiencies in design or analysis, operations or maintenance procedures that cause a significant event, fuel handling or storage event, excessive radiation exposure or severe personnel injury, and excessive discharge of radioactivity. Corrective action for these events require review and revision of appropriate procedures as necessary.

The Corrective Action Program satisfies the guidance in paragraph 1 of the enclosure to Reference 2 concerning reviews following accidents, unexpected transients, significant operator errors, or equipment malfunctions.

○ *Plant Modification Process Program*

The plant design modification program requires a review of modifications by groups which are potentially affected by the modification. This review requires that procedures potentially affected by the modification be identified and revised as necessary prior to operation of the modification. The design modification program, and the implementing procedures, satisfy the guidance in paragraph 1 of the enclosure to Reference 2 concerning review of procedures following any modification to a system.

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○ *Training and Requalification Programs*

Licensed operator, nonlicensed operator and technical staff training programs frequently utilize procedures. Discrepancies noted during training or qualification result in appropriate procedure revisions. In addition, the two year Licensed Operator Requalification cycle allows the Emergency Operating Procedures and Abnormal Operating Procedures to be either run on the simulator or extensively reviewed in training. Errors identified are addressed using the condition reporting process. This use or review of the Emergency and Abnormal procedures satisfies the guidance in paragraph 2 of the enclosure to Reference 2 concerning review of non-routine procedures.

The station also has an Emergency Response Organization drill cycle for determining the effectiveness of the emergency plan and implementing procedures. The use and/or review of the Emergency Operating Procedures, Abnormal Operating Procedures and Emergency Plan implementing procedures during the planning, preparation, training, and performance of emergency plan drills satisfies the guidance in paragraph 2 of the enclosure to Reference 2 concerning review of procedures which implement the emergency plan.

○ *Quality Assurance Activities*

The Quality Assurance Program provides for independent overview activities such as audits, performance monitoring, evaluations, and assessments. These activities routinely verify the adequacy of procedures and verify that the process for controlling documents is effective. The audit program includes the performance of an administrative control audit which addresses the adequacy of procedures, and the effectiveness of the procedure revision process. The administrative control audit, and audits performed in the operations, maintenance, engineering, and other plant support areas satisfy the guidance in paragraph 3 of the enclosure to Reference 2.

○ *Infrequently Performed Evolutions*

Infrequently performed evolutions and high risk activities require extensive planning, and a pre-activity briefing. This briefing allows personnel involved to review and discuss the procedures that govern the evolutions. If inadequacies are identified in the procedures, they are revised prior to the performance of the evolution. This planning and pre-activity briefing satisfies the guidance in paragraph 4 of the enclosure to Reference 2 concerning review of routine plant procedures which have not been used for two years.

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In addition to the programs listed above which specifically meet the guidance listed in the enclosure to Reference 2, the following programs are utilized to add to the effectiveness of the overall site procedures program:

○ *User Feedback and Procedure Compliance*

Personnel are required to notify supervisors or managers concerning procedural guidance which cannot or should not be followed. The procedure is evaluated, and if required, changed prior to the commencement or continuation of work.

○ *Industry Events Analysis*

South Texas Project is an active participant in the Significant Evaluation and Information Network. The Industry Events Analysis Program provides the necessary instruction for evaluating material from the network (e.g., Significant Event Reports, Operations Experience Reviews), and for disseminating such information to plant personnel. This evaluation includes the review of applicable procedures. Recommendations are made to resolve underlying problems, and implementation may include changes to plant procedures. Internal and external effectiveness reviews are performed to ensure the program is maintained.

○ *Vendor Technical Information*

Administrative procedures governing the Vendor Equipment Technical Information Program provide control of incoming equipment technical information and assure the appropriate engineering/technical evaluation and distribution for prompt attention to key personnel and timely incorporation of technical information into operating and maintenance procedures.

○ *Licensing Basis Documents Changes and 10CFR50.59 Evaluation*

Proposed changes to the facility or procedures and, any new tests or experiments that have a potential to affect nuclear safety, either directly or indirectly, are reviewed for impact on procedures and Licensing Basis Documents. Procedure changes are evaluated against the screening criteria of 10CFR50.59. Personnel who review these screenings have been trained in the requirements of 10CFR50.59.

○ *Trending*

South Texas Project trends data from areas such as Operations, Maintenance, Licensing, Engineering, Chemistry and Health Physics. The trending process includes the collection of data and identification of follow-up actions necessary to improve that performance. Follow-up action for adverse trends may result in procedure changes and improvements.