

The Light company

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

April 17, 1996
ST-HL-AE-5347
File No.: G09.011
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
Graded Quality Assurance Initiative

We would like to offer a few comments based on our review of the Nuclear Reactor Regulation Draft Evaluation Guide, "Development of Graded Quality Assurance Programs", Draft-Revision 5, January 1996. These comments are consistent with our discussions with the Nuclear Regulatory Commission Staff in the April 11, 1996 meeting between the Nuclear Regulatory Commission and the three pilot utilities.

We agree with the four essential elements of a graded Quality Assurance program that you have identified as the cornerstone of Nuclear Regulatory Commission regulatory positions and guidance. The Graded Quality Assurance program that we are developing, directly addresses each of these elements in a rational, reproducible and scrutable manner thereby ensuring the necessary program controls while adjusting the existing controls to be more commensurate with the importance to safety of the structures, systems, components or activities.

At the South Texas Project, the four essential elements addressed as follows:

1. *A process that identifies the appropriate safety significance of structures, systems, and components (SSCs) in a reasonable and consistent manner.*

The South Texas Project Comprehensive Risk Management Program is prescribed in our procedure OPGP02-ZA-0003. This process prescribes how risk significance of structure, systems, components and supporting activities is to be determined. Included in the inputs to the Graded Quality Assurance Working Group and Comprehensive Risk Management Expert Panel are Probabilistic Safety Analysis results, plus deterministic considerations to ensure that Probabilistic Safety Analysis limitations are appropriately addressed and structure, systems, or components not specifically modeled are addressed.

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

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2. *The implementation of appropriate QA controls for SSCs, or groups of SSCs, based on safety function and safety significance.*

The South Texas Project Operational Quality Assurance Program (Operations Quality Assurance Plan) has been revised to specifically recognize the graded application of Quality Assurance. OPGP02-ZA-0003 discusses the three levels of Quality Assurance Program controls to be applied to structure, systems, components and activities.

3. *An effective root cause analysis and corrective action program.*

Our process for root cause analysis and corrective action is our station Corrective Action Program (OPGP03-ZX-0002) that is used to ensure our compliance with 10CFR50 Appendix B Criterion XVI. This program will be used to satisfy this key element of the Graded Quality Assurance Program.

4. *A means for reassessing SSC safety significance and QA controls when new information becomes available.*

Our means for reassessing safety significance and Quality Assurance controls is covered in our procedure titled "Station Performance Data Collection, Categorization, and Reporting" (OPGP02-ZA-0004). The data which results from this process is reincorporated into item 1 above. The continuous feedback mechanisms will satisfy this key element of the Graded Quality Assurance Program.

We believe our Comprehensive Risk Management addresses the four essential elements defined by the staff; therefore, we have minimal substantive comments related to the draft guidance from our perspective. It is important to note, however, that the South Texas Project Probabilistic Safety Analysis has reached its current level of completeness primarily as the result of our need to understand more fully the inherent robustness of the unique South Texas Project three-train design. As such, it serves as a comprehensive platform for the risk information to support the Graded Quality Assurance application. We understand, however, that this draft guidance is particularly designed for the three pilot plants. We believe that even in that light, it may be overly restrictive with regard to the level of Probabilistic Safety Analysis sophistication required in an "acceptable" graded Quality Assurance program. From an industry perspective, it may set a standard that could inhibit utilities from venturing into a Graded Quality Assurance program effort.

Other specific comments are as follow:

- 1) As we discussed in our meeting of April 11, we recommend that Appendices C and E be deleted. We believe that acceptable and more complete industry guidance already exists related to the topics of Commercial Grade dedication and Probabilistic Risk Analysis, and that all that is needed is a reference to those documents.
- 2) In section 5 of the draft guidance, mention is made to the effect that "... root cause evaluations may not be performed for each failure of low-safety-significant structures, systems or components since such failures may not meet the threshold of a significant condition adverse to quality." It then goes on to indicate that the apparent cause of repetitive failures should be determined "... to determine if performance criteria and/or quality elements need to be changed."

We agree with this in principle, and would like to clarify our belief to ensure a clear understanding in application and oversight. Assuming that an item has been appropriately classified as being low safety significant, both singular and repetitive failures of that item should not create a significant condition adverse to quality. We agree that repetitive failures should receive an evaluation that determines, among other things, if controls or performance criteria need to be adjusted or if the failures have implications affecting high safety significant components. We believe that, provided the initial classification was appropriate and the program includes periodic performance reviews to confirm that items continue to be appropriately classified and that any failures have not affected probabilistic assumptions or analytical results (which is covered in the South Texas Project program), it should not necessarily be expected that those failures would result in changes being made to performance criteria or levels of quality assurance controls.

Your letter specifically requested us to identify the areas in which we believe further interactions with the staff are needed. As we discussed in the April 11, 1996 meeting, the overall intent of the January 24, 1996 letter was not clear relative to the need for specific information on the South Texas Project Graded Quality Assurance project. We propose that the South Texas Project and the Nuclear Regulatory Commission meet the week of April 22 in Washington to discuss the status of the South Texas Project Graded Quality Assurance Project and plans for further interactions between the Nuclear Regulatory Commission and the South Texas Project.

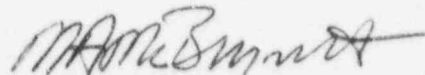
We also believe that for low risk safety related structures, systems or components, there is a "de minimus" level of risk significance below which the application of any Quality Assurance controls is not risk or cost effective. Additional dialog regarding the definitions for "safety related" and the applicability of Appendix B is clearly warranted.

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We look forward to further interactions with you on this important industry initiative. If you have any questions regarding this subject, please contact Mr. S. L. Rosen at (512) 972-7138 or me at (512) 972-7206.



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