

# The Light company

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

June 10, 1996  
ST-HL-AE-5383  
File No.: G03.12  
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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  
Response to Systematic Assessment of  
Licensee Performance (SALP) Report 50-498/96-99; 50-499/96-99

Reference: Letter from L. J. Callan, NRC to W. T. Cottle, South Texas Project dated  
May 1, 1996 (ST-AE-HL-94513)

The referenced letter is the SALP report for the South Texas Project Electric Generating Station for the period of September 25, 1994 through March 23, 1996. The South Texas Project generally concurs with the SALP ratings and overall assessment findings in the report.

We are pleased and proud of the extraordinary progress in safety performance our management and workforce team, with strong co-owner support, have achieved during the past SALP period. The South Texas Project agrees the key element to continual improvement in sustaining a strong safety performance trend is the willingness and capability to do critical self assessment of station activities. Every member of the South Texas Project "WE Team" is encouraged to bring problems forward and actively participate in their resolution. The challenges, presented in the SALP report, for the South Texas Project as WE continue on our journey toward World Class performance are understood and accepted with enthusiasm. WE are committed to attain a superior rating in the operations and engineering areas and to maintain our superior rating in maintenance and plant support areas.

During a public meeting conducted on May 16, 1996 regarding this report, we discussed differences in professional opinion regarding some of the details in the SALP report in the engineering functional area. The attachment to this letter discusses specific comments regarding those differences. These comments are provided to clarify understanding of individual issues.

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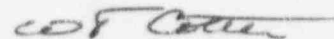
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The discussion in the attachment to this letter should not detract from the fact that the South Texas Project appreciates the NRC's insightful assessment of the engineering functional area. Attention to detail to minimize errors in performing engineering work activities should continue to improve. We expect to build on our current engineering reliability and training programs to ensure the best service is provided to their customers. Self identification of problems and effective corrective action will continue to be a mainstay in our road toward engineering excellence.

One of our challenges is to clearly communicate with the NRC staff our position on solving complex engineering issues as they develop and to understand how the NRC staff perceives these same issues. As discussed during the public meeting, we agree that a more formal and focused meeting with the NRC regional staff to understand the challenges facing the South Texas Project in the engineering area and our initiatives to meet these challenges would be beneficial. We expect to communicate with the NRC regional staff in the very near future to arrange such a discussion.

In summary, we appreciate the NRC's candid and insightful assessment findings. Our commitment remains to attain superior safety performance in all functional areas, not only over the near term but to ensure safe and reliable operation of both South Texas Project units over the long term.

If you should have any questions regarding this letter, please feel free to contact me or Mr. Lawrence Martin at (512) 972-8686.



W. T. Cottle  
Executive Vice President  
and General Manager, Nuclear

KJT/

Attachment: Specific Engineering Issues Discussed in SALP Report 50-498/96-99; 50-499/96-99

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c:

Leonard J. Callan  
Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Thomas W. Alexion  
Project Manager  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001 13H15

David P. Loveless  
Sr. Resident Inspector  
c/o U. S. Nuclear Regulatory Comm.  
P. O. Box 910  
Bay City, TX 77404-0910

J. R. Newman, Esquire  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, DC 20036-5869

M. T. Hardt/W. C. Gunst  
City Public Service  
P. O. Box 1771  
San Antonio, TX 78296

J. C. Lanier/M. B. Lee  
City of Austin  
Electric Utility Department  
721 Barton Springs Road  
Austin, TX 78704

Central Power and Light Company  
ATTN: G. E. Vaughn/C. A. Johnson  
P. O. Box 289, Mail Code: N5012  
Wadsworth, TX 77483

Rufus S. Scott  
Associate General Counsel  
Houston Lighting & Power Company  
P. O. Box 61067  
Houston, TX 77208

Institute of Nuclear Power  
Operations - Records Center  
700 Galleria Parkway  
Atlanta, GA 30339-5957

Dr. Joseph M. Hendrie  
50 Bellport Lane  
Bellport, NY 11713

Richard A. Ratliff  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78756-3189

U. S. Nuclear Regulatory Comm.  
Attn: Document Control Desk  
Washington, D. C. 20555-0001

J. R. Egan, Esquire  
Egan & Associates, P.C.  
2300 N Street, N.W.  
Washington, D.C. 20037

J. W. Beck  
Little Harbor Consultants, Inc.  
44 Nichols Road  
Cohasset, MA 02025-1166

**Specific Engineering Issues Discussed in  
SALP Report 50-498/96-99; 50-499/96-99**

- Reference: 1. Letter from T. J. Jordan, South Texas Project to the Nuclear Regulatory Commission dated December 5, 1995 (ST-HL-AE-5214)
2. NRC Inspection Report 50-498/94-32; 50-499/94-32 dated November 10, 1994 (ST-AE-HL-93984)

The following discussion is provided to clarify some individual engineering functional area issues in South Texas Project's most recent SALP report. These issues were characterized in the report as deficiencies pertaining to engineering work activities.

**Issue #1: Rosemount Transmitters**

The SALP report stated there were deficiencies pertaining to other engineering work activities citing calibration data trending as an example. Specifically, the report stated the program for Rosemount transmitters lacked evaluation threshold criteria for trended calibration data and was unable to detect a loss of fill oil in transmitters not in the enhanced monitoring program.

Reference 1 described actions taken to enhance South Texas Project's program regarding loss of fill oil in safety-related pressure transmitters manufactured by Rosemount and provided additional details to clarify managing the Rosemount loss of fill oil issue.

The evaluation threshold criteria for trended calibration data is specified in South Texas Project Design Engineering Report No. 90-01.93/Revision 0, "Rosemount Transmitter Calibration Data Trending Program" Table 3 "Maximum Allowable Cumulative Drifts For 1153/1154 Oil Loss Transmitters" on page 17 of 200. The criteria is consistent with Rosemount Technical Bulletin No. 4 dated December 22, 1989. Individual analysis and trending spreadsheets incorporating these drift limits have been implemented for each transmitter in the enhanced surveillance program. The template spreadsheet used to create these spreadsheets was sent to Rosemount with plant calibration data for verification and validation for use in detecting fill-oil loss. Use of these spreadsheets has successfully identified, prior to transmitter failure, adverse trends in transmitters that were indicative of fill-oil loss, one of which was verified as such by Rosemount. The component analysis sheets that were performed further indicate the methodology used in evaluating these components for fill-oil loss. In addition, written instructions have been implemented that give guidance to reliability engineers for analysis and evaluation of trended data to identify failed or failing transmitters. Calibration review acceptance criteria is based on the cumulative zero and span drift thresholds and the historical trend analysis of these datum. These instructions specifically state conditions indicating a potentially adverse loss of fill-oil and actions warranted.

Failure of transmitters not in the enhanced surveillance program have been detected in the past through a failure analysis process of the quarterly equipment history review. The failure analysis conducted for the "Systems Engineering Quarterly Report" for the quarter ending March 31, 1995, identified a potential adverse failure trend in Rosemount model 1151 transmitters. While the model 1151 is not part of the fill-oil loss suspect population, this is indicative that the analysis for this report has and will identify conditions warranting further investigation. This review process has recently been enhanced by implementation of a software tool for reliability engineers to consistently rate instrument performance severity levels for screening out-of-tolerance calibration data. In addition, presently and at the time of the inspection, all instrument calibrations are reviewed by Reliability Engineering as part of the Equipment History Program. This information is entered into the Equipment History Database and trended. Adverse trends are identified and corrective action is taken to address the problem. As part of this process, any failures or out-of-tolerance conditions associated with Rosemount instruments are immediately brought to the attention of the Rosemount Loss-of-Fill Program Coordinator for further evaluation. Training on fill-oil loss detection has recently been provided to technicians.

Some of the symptoms of fill-oil loss are: loss of response time, output shift, slow drift in either direction, decrease in the noise or RMS signal, and inability to respond over the entire range. Review of STP equipment history over a period beginning May 29, 1989 and ending August 7, 1995, reveals that several transmitter failures within the suspect population not included in the enhanced surveillance program that exhibited fill-oil loss symptoms were identified and subsequently replaced. Three were identified as having 'Excessive Static Shift', five were characterized as having unstable output characteristics (e.g. poor repeatability, noise, erratic behavior, drift, ...), two were identified as being 'sluggish', and in one case two transmitters had been out of tolerance on two previous calibrations so all four transmitters in the group were prudently replaced.

## **Issue #2: Motor-Operated Valve (MOV) Program**

The SALP report stated the motor-operated valve program established the design basis capability of MOVs that had not been tested at or near design basis conditions. The report stated however, three engineering evaluations of MOV programs were indicative of a tendency to reduce Generic Letter 89-10 design standards to establish the acceptability of MOVs.

South Texas Project is concerned that the comments in the SALP report regarding our Generic Letter 89-10 MOV program can be taken out of context in the overall assessment of this otherwise strong program. The South Texas Project was one of the first licensees to complete the close out inspection of Generic Letter 89-10. The management of this program is indicative of the teamwork across the station to improve equipment reliability.

Reference 2 acknowledged that the South Texas Project considered the three engineering evaluations discussed above to be isolated cases resulting from the transition occurring in its organization at the time to expedite completion of commitments to Generic Letter 89-10. South Texas Project expressed

confidence, at the time of the close-out of the commitments to Generic Letter 89-10, that additional ongoing training and the anticipated long-term stability of the motor-operated valve organization would assure the consistent use of its Generic Letter 89-10 methodology as the basis for maintaining design basis capability. We believe that our management of the MOV program since the Generic Letter 89-10 close-out demonstrates the design basis capability of South Texas Project MOVs has been maintained consistent with Generic Letter 89-10 methodology.