

The Light company

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

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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 Questions Regarding Operations Quality Assurance Plan - Change QA-027

- Reference:
- 1) Letter from Kenneth E. Brockman, Acting Director Division of Reactor Safety to William T. Cottle dated September 23, 1996, "Operations Quality Assurance Plan Change QA-027"
 - 2) Letter from W. T. Cottle to U. S. Nuclear Regulatory Commission dated April 9, 1996, "Operations Quality Assurance Plan Change QA-027" (ST-HL-AE-5334)

Attached is the South Texas Project's response to the concerns raised by the Nuclear Regulatory Commission regarding the Operations Quality Assurance Plan (OQAP) Change QA-027, as documented in Reference 1. The Operations Quality Assurance Plan Change QA-027 was submitted on April 9, 1996, to the Nuclear Regulatory Commission, per Reference 2, for informational review. The changes were considered to be administrative in nature and were not considered to be a reduction in commitment in the Quality Assurance Program at the South Texas Project.

The South Texas Project, as other nuclear utilities, is required to maintain and implement a Quality Assurance Program which complies with the requirements of 10CFR50 Appendix B. Additionally, the South Texas Project has committed, in its Updated Final Safety Analysis Report, to various Quality Assurance related Nuclear Regulatory Commission Regulatory Guides, which in turn endorse industry (ANSI) standards which were developed to provide a more detailed "roadmap" as to how to best implement 10CFR50 Appendix B requirements.

The South Texas Project Operations Quality Assurance Plan describes the Quality Assurance Program at the South Texas Project, and complies with applicable regulatory requirements and South Texas Project licensing commitments for Quality Assurance. In addition, it often describes activities which are specific to the South Texas Project, and are not necessary in order to comply with regulatory requirements and commitments to Regulatory Guides and industry standards.

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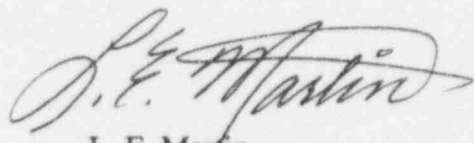
In evaluating potential changes to the South Texas Project Operations Quality Assurance Plan, consideration of those changes related to 10CFR50.54(a) is required, in order to determine if a reduction in commitment exists. In making these determinations, the South Texas Project uses the following criteria:

- Will the change eliminate a program or activity which is part of the "baseline program" (i.e., designed to comply with regulatory requirements or the South Texas Project specific commitments to Regulatory Guides and industry standards)? If so, and if no other equivalent program or activity will replace it, a reduction in commitment exists.
- Will the change eliminate essential implementing controls (i.e., changes which will result in a change in the ultimate work product, typically non-administrative in nature) from a program or activity, which is part of the baseline program? If so, and if no equivalent controls will replace them, a reduction in commitment exists.
- Will the change eliminate a program or activity which, while not being part of the baseline program designed to comply with regulatory requirements or the South Texas Project-specific commitments to Regulatory Guides and industry standards, is nevertheless included in the South Texas Project specific Quality Assurance Program? If so, and if no other equivalent program will replace it, a reduction in commitment exists.

The South Texas Project clearly understands that changes which are made which constitute a reduction in commitment to the Quality Assurance Program require submittal to the Nuclear Regulatory Commission under 10CFR50.54(a) and can not be implemented until approval is given by the Commission. The South Texas Project does not consider the changes made in Change QA-027 as reductions in commitment.

It should be noted that there is no requirement to submit each change which does not constitute a reduction in commitment. These changes are normally provided in the Operations Quality Assurance Plan update submitted approximately every two years. The South Texas Project has in the past (as in this case), submitted changes to the Operations Quality Assurance Plan which were not reduction in commitment to the Nuclear Regulatory Commission for review as information to allow the Nuclear Regulatory Commission to have an up-to-date version of the South Texas Project's plan versus waiting for the biennial update.

If there are any further questions regarding the South Texas Project's Operations Quality Assurance Plan Change QA-027 or the South Texas Project Quality Assurance Program, please contact Mr. R. J. Rehkugler at (512) 972-7922.



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

JMP/

Attachment: Response to NRC Comments on OQAP Change QA-027

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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, Mail Code 13H3
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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. Bertram Wolfe
15453 Via Vaquero
Monte Sereno, CA 95030

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

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

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

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

Response to NRC Comments on OQAP Change QA-027

NRC Comment 1

Chapter 2.0, "Program Description," Revision 9, paragraph 5.6.1, previously stated that:

"During normal operations, the QA Program will be executed by STPEGS personnel, who may be assisted by subcontract personnel. During refueling, maintenance, and inservice inspection, first-level quality control inspection and nondestructive examination (NDE) activities may be subcontracted. However, STPEGS will retain responsibility for the total QA Program, and NA&L personnel will perform audits and surveillances of subcontracted QA activities."

Change QA-027, revised paragraph 5.6.1 to:

"During normal operations the QA Program will be executed by STPEGS personnel, who may be assisted by subcontract personnel. During refueling, maintenance, and inservice inspection, first-level quality control inspection and nondestructive examination (NDE) activities may be subcontracted. However, STPEGS will retain responsibility for the total QA Program, and NA&L personnel will perform appropriate overview activities of subcontracted QA activities."

Change QA-027, added Chapter 15, "Quality Assurance Overview Activities," paragraph 5.1.1, "Requirements." Paragraph 5.1.1 states that overview activities "include, but are not limited to, audits, assessments, evaluations, performance monitoring, and surveillances."

APPARENT REDUCTION IN COMMITMENT - *The previously required audits and surveillances of subcontracted quality assurance activities appears to have been reduced to allow substitution of undefined assessments, evaluations, performance monitoring, or other undefined overview activities.*

Response to Comment 1

The staff is concerned that there may be a reduction in commitment based on the Operations Quality Assurance Plan clarification that "appropriate" oversight of subcontracted activities will occur, as opposed to the previous wording that audits and surveillances would be done.

This is not a reduction in commitment. The previously-discussed audits and surveillances have not been eliminated from our scope of oversight. The Operations Quality Assurance Plan change merely adds identification of the other types of oversight that may occur. These types of oversight (audits, assessments, evaluations, surveillances, performance monitor) are defined in the "Definitions" section of the Operation Quality Assurance Plan.

For reference here and throughout the remainder of the response, these different methods and their applicability towards fulfilling regulatory requirements and/or South Texas Project-specific Quality Assurance commitments to Regulatory Guides and ANSI standards are described below:

Audits: Required by regulation and the South Texas Project commitment to Regulatory Guide/ANSI standard, to be performed by individuals qualified/certified, again, per Regulatory Guide/ANSI standard. Regardless of whether any other type of oversight is employed (based on the nature of the activities to be observed), audits will still be performed at the South Texas Project. Specific details regarding the scoping, scheduling, the entire process itself, and qualification of personnel who perform them, are proceduralized.

Assessments: Not required as part of the South Texas Project "baseline" program needed to comply with 10CFR50 Appendix B or commitments to Regulatory Guides/ANSI standards. Assessments are similar to audits, and typically focus on the "human performance/human factors" considerations of the South Texas Project work processes. They are typically non-technical in nature. Specific details regarding the scoping, scheduling, the entire process itself, and qualification of personnel who perform them, are proceduralized.

Evaluations: As a process, not required as part of the South Texas Project baseline program. However, this process is typically the one used for performing oversight activities which comply with station Independent Safety Engineering Group (ISEG) activities. From a process standpoint, they are similar to audits. They are typically technical in nature. Specific details regarding scoping, scheduling, the entire process itself, and qualification of personnel who perform them, are proceduralized.

Surveillances: Not required as part of the South Texas Project baseline program. This process is used for performing short-duration oversight of both real time work activities and historical reviews. It can be equally expected to address both programmatic compliance and technical topics. It is also used to consolidate and report ongoing Performance Monitoring activities/results (e.g., Surveillance reports are often used to summarize and report on a month's worth of Performance Monitoring activities). Specific details regarding scoping, scheduling, the entire process itself, and qualification of personnel who perform them, are proceduralized.

Performance Monitoring: Not required as part of the baseline program. This process was originally designed to augment the existing inspection program, expanding the scope of inspectors' focus while in the field inspecting specific attributes. It has since been expanded to enable real time observation of virtually any activity on the site. Specific details regarding scoping, scheduling, the entire process itself, and qualification of personnel who perform them, are proceduralized.

In summary, these different types of oversight methods at South Texas Project enable the site to tailor its oversight effort to appropriately match the task at hand. The Nuclear Regulatory Commission letter referred to the Operations Quality Assurance Plan text which indicated that other types of oversight activities may be substituted for audits and surveillances. This is correct. However, there has been no elimination of those previously identified types of oversight methods, nor is there intent, either implicit or explicit, to eliminate them. Therefore, no reduction in commitment exists.

NRC Comment 2

Chapter 2.0, Program Description, Revision 9, paragraph 5.6.2 previously stated that:

"When first-level quality control inspection and NDE are performed by STPEGS personnel, they are qualified and certified in accordance with applicable codes, standards, procedures, and other regulations. Monitoring and surveillance of the quality control and NDE activities shall be performed by Operations QA personnel."

Change QA-027, deleted the last sentence of paragraph 5.6.2.

APPARENT REDUCTION IN COMMITMENT - *The previously required monitoring and surveillances of quality control and nondestructive examination activities appears to have been deleted.*

Response to Comment 2

There is no reduction in commitment. The change is purely editorial and merely reflects the correct organizational alignment and oversight responsibilities at the South Texas Project since the Quality Control and Quality Assurance organizations were combined some time ago. Oversight of "Quality Control" and "NDE" activities is primarily addressed in Operations Quality Assurance Plan Chapter 15.0 (refer to section 5.4), and is obtained through external, independent assessments/evaluations/audits.

NRC Comment 3

Chapter 2.0, Program Description, paragraph 2.1, "Scope."

Applicability of the quality assurance plan to the physical security program was deleted.

APPARENT REDUCTION IN COMMITMENT - *Various specific quality assurance requirements, such as the performance of audits in accordance with NRC Regulatory Guide 1.44 and ANSI N.45.2.12 are not contained in the security program and no longer apply.*

Response to Comment 3

There is no reduction in commitment. The correct licensing basis document for the security program is the Physical Security Plan, not the Operations Quality Assurance Plan, and that document contains all the necessary program requirements for satisfying applicable regulatory requirements (Part 73, not Part 50 Appendix B). The Physical Security Plan also contains the requirement for annual audits. The Quality Department performs these audits, and the South Texas Project audit program is prescribed in Operations Quality Assurance Plan Chapter 15.0. There has been no deletion of our Regulatory Guide 1.44/ANSI N45.2.12 audit program as it applies to Security or any other program that is audited at the South Texas Project.

NRC Comment 4

Chapter 15.0, "Quality Assurance Audit and Surveillance," Revision 9, paragraph 5.1, previously required that:

"A comprehensive audit program in compliance with Reference 4.1 shall be established and implemented by HL&P to verify internal and external quality activity compliance with the Operations QA Program."

Chapter 15.0, Revision 9, Reference 4.1 was "ANSI N45.2.12/Reg. Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants."

Change QA-027, changed Reference 4.1 to "UFSAR Table 3.12-1."

APPARENT REDUCTION IN COMMITMENT - *The specific commitment to ANSI N45.2.12 and NRC Regulatory Guide 1.144 has been changed to the less specific commitment to the UFSAR table 3.12-1. NOTE: Although most UFSAR sections can be changed without prior NRC approval in accordance with 10 CFR 50.59, 10 CFR 50.54(a) requires prior NRC approval for changes to the Quality Assurance Program Description that constitute a reduction in commitment.*

Response to Comment 4

There is no reduction in commitment. The change is purely editorial. (For information, the location of the South Texas Project's commitment to Nuclear Regulatory Commission Regulatory Guides is in the Updated Final Safety Analysis Report (UFSAR). The cited Operations Quality Assurance Plan locations are merely references, not listings of commitments. Operation Quality Assurance Plan Chapter 2.0, paragraph 5.5.1 is the location of the Operations Quality Assurance Plan commitment to comply with Regulatory Guides and daughter standards, as prescribed in the UFSAR Table.)

NRC Comment 5

Chapter 15.0, "Quality Assurance Audit and Surveillance," Revision 9, paragraph 5.4.1, previously required that:

"Internal audits shall be conducted by the Quality Department and performed with a frequency commensurate with their safety significance, past performance and regulatory requirements. An audit of safety-related activities shall be completed in accordance with formal audit schedules."

Change QA-027, changed the number of paragraph 5.4.1 to paragraph 5.2.3.1 and deleted the last sentence of the paragraph.

APPARENT REDUCTION IN COMMITMENT - *The commitment to perform audits of safety-related activities in accordance with formal audit schedules has been deleted.*

Response to Comment 5

There is no reduction in commitment. The change is purely editorial. Paragraph 5.2.1 of Operations Quality Assurance Plan Chapter 15.0 requires that the audit program comply with reference 4.1 (i.e., Regulatory Guide 1.44/ANSI N45.2.12, as committed to in UFSAR Table 3.12-1), which requires audit scheduling. Paragraph 5.5 of the same Operations Quality Assurance Plan chapter requires issuance of an approved (i.e., "formal") overview plan, which is the tool used to schedule audits.

NRC Comment 6

Change QA-027, added paragraph 5.4.3, Chapter 15.0, Quality Assurance Audit and Surveillance, stating that:

"Assessments and audits may be interchangeable provided the scope is appropriate and approved by the Director, Quality."

APPARENT REDUCTION IN COMMITMENT - *The change allows the substitution of "assessments" for programmatically required audits without providing requirements to assure that 10 CFR 50 Appendix B requirements and ANSI N45.2.12 and NRC Regulatory Guide 1.144 commitments are met.*

Response to Comment 6

There is no reduction in commitment. The change merely recognizes the numerous oversight methods available at the South Texas Project, and in no way detracts from our commitments to have in place and implement an audit program that complies with applicable regulatory requirements and plant-specific commitments. (See response to item 1.)

NRC Comment 7

Chapter 15.0, Quality Assurance Audit and Surveillance, Revision 9 paragraph 5.10, previously required that:

"Scheduled site surveillances are performed using a surveillance checklist. The surveillance checklist shall be prepared using applicable procedures, specifications, codes, and regulatory requirements for resource requirements."

Change QA-027, deleted paragraph 5.10.

APPARENT REDUCTION IN COMMITMENT - *The previous commitment for the performance of surveillances using a surveillance checklist and the requirements for the preparation of the checklist has been deleted.*

Response to Comment 7

There is no reduction in commitment. The change is editorial, recognizes our new performance monitoring process, and clearly states (paragraph 5.3.1) that surveillances/monitoring will be controlled by procedures or instructions. The procedure for surveillance prescribes the preparation process, including use of checklists and references. This level of detail is not appropriate at the program level.

NRC Comment 8

Chapter 18.0, ASME Code Section XI - Inservice Inspection and Testing, Revision 5, paragraph 5.2 previously required that:

"The General Manager, Nuclear Assurance and Licensing is responsible for verifying the implementation of the inservice examination and testing programs through audits and surveillances, interfacing with the Authorized Inspection Agency, and performance of nondestructive examinations as requested by Nuclear Engineering."

Change QA-027, replaced the paragraph 5.2 requirement for performance of audits and surveillances with the performance of "appropriate quality overview activities."

APPARENT REDUCTION IN COMMITMENT - *The previous commitment for the performance of audits and surveillances of ASME Code Section XI activities appears to have been reduced.*

Response to Comment 8

There is no reduction in commitment. The commitment to perform audits and surveillances of ASME Code Section XI activities has not been deleted. The change provides additional methods for performing overview of these activities and to perform the appropriate type of overview.