

50-498/499 OL

HOUSTON LIGHTING & POWER COMPANY

SOUTH TEXAS PROJECT
PROCEDURE MANUAL

S-145
8/13/85

DOCKETED
USNRC

SUMMARY OF REVISIONS

PROC NO. PLP-02	SUBJECT REPORTING DESIGN AND CONSTRUCTION DEFICIENCIES TO NRC	'85 OCT 17 A9:50
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REVISION NUMBER	Quality Related - Yes	REVISION DESCRIPTION
0		Changed procedure number from PEP-4.01 to PLP-02. In addition, changed the lead responsibility for initial notification of all deficiencies solely to the Team Leader, Nuclear Licensing; removed distinction between site and home office handling of deficiencies and clarified engineering's role in the evaluations.
1		Complete revision to procedure.
2		Change to Section 5.6 changing Project Manager to Manager, South Texas Project. Editorial changes to Attachment 9.3. Revision to Attachment 9.5.
3		Changed "incident" to deficiency. Added new sections 4.2.10, 5.4, 6.5, 6.6 and re-renumbered existing Sections. Added new Attachments 9.8 and 9.9. Attachments 9.5 and 9.7 were revised.
4		Changed Manager, STP Site to Deputy Project Manager in Attachment 9.8 on Page 23. Added Deputy Project Manager Attachment 9.9, page 24.
5		Changed Executive Vice President, Nuclear to Group Vice President, Nuclear in Sections 4.2.9, 4.3.4 and 5.8. Deleted reference to Vice President, Nuclear Engineering and Construction in Section 5.8 since this position no longer exists. Added the word boundary to attachment 9.5, item B.1 to identify "the integrity of the reactor coolant pressure boundary." These changes are editorial in nature.

NUCLEAR REGULATORY COMMISSION

Docket No. 50-498-499-OL Official Exh. No. Staff EX-145
 in the matter of _____
 Staff ✓ IDENTIFIED ✓
 Applicant _____ RECEIVED _____
 Intervenor _____ REJECTED _____
 Conf'g Off'r _____
 Contractor _____ DATE 8-13-85
 Other _____ Witness _____
 Reporter TATE

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REVISION AUTHORIZATION						
REVISION NUMBER	0	1	2	3	4	5
DATE ISSUED	05-18-82	08-04-82	01-27-83	08-03-83	07-01-84	05-21-85
PREPARED BY	M.E. Powell	L.J.Klement	M.E. Powell	M.E. Powell	M.E. Powell	M. E. Powell
APPROVED BY	L.J.Klement	L.J.Klement	L.J.Klement	L.J.Klement		M.E. Powell
APPROVED BY						

Staff *145

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1.0 PURPOSE

- 1.1 To establish the procedure for identifying and evaluating conditions which could potentially affect the safety functions of STP and for reporting deficiencies, defects and noncompliance to NRC in accordance with 10 CFR 50.55(e) and 10 CFR 21.

2.0 SCOPE

- 2.1 This procedure applies to conditions identified during the design, engineering, and construction phases of each unit of the STP, prior to the issuance of the operating license for each respective unit.
- 2.2 This procedure also applies to conditions reported to STP by its architect-engineers, constructors, suppliers and any other contractors or consultants.

3.0 REFERENCE DOCUMENTS

- 3.1 NRC I&E Information Notices 80-28, "Prompt Reporting of Information in Accordance with 50.55(e)." 79-30, "Reporting of Defects and Noncompliance, 10 CFR Part 21."
- 3.2 10 CFR 50.55(e) - Attachment 9.1
- 3.3 10 CFR 21
- 3.4 NRC I&E Inspection Manual, "Guidance - 10 CFR 50.55(e) Construction Deficiency Reporting", 4-01-80.
- 3.5 Corporate Procedure, Handling of Conditions Potentially Reportable under 10CFR21
- 3.6 Reporting of Safety-Related Defects and Non-Compliances - Attachment 9.2

4.0 DEFINITIONS

- 4.1 10 CFR 50.55(e) Definitions - As used in this procedure

- 4.1.1 Significant - Having an effect or likely to have an effect on, or influence, the safe operation of the facility in an adverse manner.
- 4.1.2 Extensive - Expenditure of resources (time, manpower, or money) to a degree disproportionate with the original design, test or construction expenditure.
- 4.1.3 Final Design - Denotes those drawings, specifications, or other engineering documents that have been reviewed, approved and released for fabrication, installation or construction.

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- (3) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 100.11.

In all cases, the term "basic component" includes design, inspection, testing, or consulting services, important to safety, that are associated with the component hardware, whether these services are performed by the component supplier or others.

Those plant structures, systems, or components, or parts thereof, at a minimum, which are identified as either Safety Class 1, 2, or 3 or Seismic Category I, are basic components.

- 4.2.2 Commercial Grade Item - An item that is (1) not subject to design or specification requirements that are unique to facilities or activities licensed by NRC, and (2) used in applications other than facilities or activities licensed by NRC, and (3) able to be ordered from a manufacturer/supplier on the basis of specifications set forth in his published product description (e.g., a catalog).

A commercial grade item becomes a basic component after receipt when it is dedicated (designated for use as a basic component) by the recipient.

- 4.2.3 Deviation - A departure from the technical requirements of a procurement document for a basic component.

- 4.2.4 Procurement Document - A contract which defines the requirements which the facility or basic component must meet in order to be considered acceptable by the purchaser. This includes specifications, purchase orders and other documents that establish the requirements for purchaser acceptance and includes code requirements, drawings and procedures that are referenced as part of the procurement document.

- 4.2.5 Delivery - Transfer of control of a basic component. Delivery occurs upon acceptance of a basic component made subsequent to a test or inspection which takes place within a reasonable time after receipt. If no test or inspection is performed within a reasonable time, the basic component will be deemed to have been delivered. If a component is rejected on the basis of a deviation identified during a receipt test or inspection, delivery has not occurred.

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contractors or consultants. See Attachment 9.8 for a listing of STP responsible individuals.

- 4.2.11 Constructing or Construction - The design, manufacture, fabrication, placement, erection, installation, modification, inspection, or testing of a facility or activity, and consulting services related to the facility or activity that are important to safety.

4.3 Procedure Definitions

- 4.3.1 Significant Deficiency - An event or condition which has an effect or is likely to have an effect on, or influence, the safe operation of the facility in an adverse manner.
- 4.3.2 Initial Evaluation - Evaluation of a significant deficiency to determine if it is a reportable or potentially reportable deficiency under 10 CFR 50.55(e) or if there is a need to consider it further under 10 CFR Part 21.
- 4.3.3 Technical Evaluation - The technical, including safety, evaluation of a significant incident to determine if the criteria for reportable deficiency under 10 CFR 50.55(e) or a defect or non-compliance under 10 CFR 21 are met. The technical evaluation is performed subsequent to the initial evaluation.
- 4.3.4 Incident Review Committee (IRC) - The project committee responsible for conducting the initial evaluation and subsequent technical evaluation of significant deficiencies. Unless an incident review is conducted by a committee under the direction and supervision of the Group Vice President, Nuclear as a minimum, the IRC shall consist of the following members or their designees:
1. Project Licensing Engineer (Chairman)
 2. Project QA Supervisor
 3. Cognizant Supervising Project Engineer, Houston Engineering
 4. Other cognizant individual(s) as designated by the Chairman.
- 4.3.5 Notification - A telephone, telegraphic or verbal report.

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5.5 Incident Review Committee (IRC)

5.5.1 The IRC is responsible for conducting the initial evaluation of significant deficiencies and, if applicable, for initiating and reviewing the technical evaluation.

5.5.2 The IRC Chairman is responsible for drafting the written reports to NRC.

5.5.3 The IRC Chairman is responsible for publishing minutes of each IRC meeting. Minutes shall include, as a minimum, identification of participants, listing of deficiencies considered, and an explanation of findings, as applicable.

5.5.4 The IRC Chairman is responsible for notifying the NRC of potentially reportable deficiencies and reportable deficiencies. The initial notification (if appropriate) shall be made within 24 hours of the time that the IRC Chairman is informed that there exists a significant deficiency.

5.5.5 The IRC Chairman is responsible for maintaining files pertaining to 10 CFR 50.55(e) and 10 CFR 21 evaluations.

5.5.6 The IRC Chairman is responsible for notifying the originator of the disposition of those items referred to the IRC. This may be accomplished by sending the originator a copy of the IRC meeting minutes.

5.6 Manager, Nuclear Licensing

5.6.1 The Manager, Nuclear Licensing is responsible for reviewing the IRC's completed evaluations and the written reports before submission to the NRC.

5.7 Manager, South Texas Project

5.7.1 The Manager, South Texas Project ensures that appropriate resources are made available to assure that evaluations and reports are completed in a timely manner.

5.8 Group Vice-President, Nuclear

5.8.1 The Group Vice-President, Nuclear is responsible for submitting the written reports to the NRC.

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6.4.1 If the DEF is to be reviewed by IRC, it is so noted on the DEF and immediately forwarded (hand-carried) to the IRC Chairman.

6.4.2 If the DEF is not to be reviewed by IRC, it is so noted on the form along with an appropriate explanation and copies sent to:

- 1) Originator
- 2) IRC Chairman
- 3) Responsible SPE

6.5 In the event that a responsible individual (see attachment 9.8) becomes aware that any STP supplier, contractor or consultant has notified the NRC of a 10CFR21 item that may be applicable to STP, he shall immediately so inform the IRC Chairman.

6.6 In the event that any of those individuals responsible for the interface with the STP architect-engineer and/or NSSS supplier becomes aware that the STP architect-engineer and/or NSSS supplier has notified the NRC, or HL&P, of a potentially reportable deficiency, he shall immediately so inform the IRC Chairman.

6.7 The IRC Chairman, upon notification by the Manager, Engineering, of a significant deficiency; or by a responsible individual becoming aware of a 10CFR21 item reported by a vendor (per Section 6.5); or after being informed of a potentially reportable deficiency as required by Section 6.6; shall initiate an IRC meeting.

6.7.1 The IRC shall conduct an initial evaluation to determine if the significant deficiency is a potentially reportable deficiency, a reportable deficiency, or not reportable, under provisions of 10 CFR 50.55(e) and to determine if there is a need to further consider the deficiency under the provisions of 10 CFR 21.

6.7.2 The determination of the IRC shall be documented on an IRC Evaluation Form (Attachment 9.4). Minutes of the IRC meeting shall be available as soon as practicable. A copy of the IRC Evaluation Form shall be sent to the originator.

6.7.3 If the IRC determines that a reportable or potentially reportable deficiency exists the IRC Chairman shall notify the NRC. The initial evaluation and notification to NRC shall be accomplished within 24 hours from the time that the IRC Chairman was informed that a significant deficiency exists. The notification to NRC must be documented in telephone minutes.

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6.9 For reportable or potentially reportable deficiencies that are also determined to be reportable under 10 CFR 21, NRC shall be notified by including the appropriate information in the report described in Section 7.0. However, the Notification process and other subsequent requirements of this procedure shall be invoked as if the defect or noncompliance were a reportable deficiency under 10 CFR 50.55(e). For deficiencies determined reportable under 10 CFR 21 but not otherwise reportable under 10 CFR 50.55(e), the NRC shall be notified in accordance with 10 CFR 21. 10 CFR 21 requires initial notification within 48 hours of completion of IRC's determination that 10 CFR 21 applies.

6.10 The IRC shall also be convened from time to time by the IRC Chairman to review those DEF's that Engineering determined were not significant. The purpose of this review is to provide added assurance that all significant items are being considered by the IRC. Meeting minutes should include a listing of those DEF's considered and conclusions reached.

7.0 REPORTS TO NRC

7.1 For those deficiencies determined to be reportable under 10 CFR 50.55(e) the written report will be submitted to NRC within 30 calendar days of the initial notification to NRC. This report shall contain the pertinent elements identified in Attachment 9.6. For those items called into the NRC as potentially reportable but subsequently determined not to be reportable, verbal notification must be made to the NRC within 30 calendar days followed by written confirmation.

7.2 For those deficiencies determined to be reportable under 10 CFR 21 but not under 10 CFR 50.55(e), the written report shall be submitted to NRC within 5 days of the completion of IRC's determination that 10 CFR 21 applies.

8.0 MAINTENANCE OF RECORDS

8.1 In addition to any other files maintained by applicable procedures, a file of each deficiency evaluated by an IRC subsequent to the effective date of this procedure shall be maintained under the cognizance of the IRC Chairman.

8.2 Each file shall contain the documentation associated with the deficiency including the IRC Evaluation Form with all supporting documentation, copies of minutes of IRC meetings, and all copies of written reports to NRC.

8.3 A copy of those items described in 8.2 shall be forwarded to Records Management.

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ATTACHMENT 9.1 - 10 CFR 50.55(e)

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(e) (1) If the permit is for construction of a nuclear power plant, the holder of the permit shall notify the Commission of each deficiency found in design and construction, which, were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant, and which represents:

(i) A significant breakdown in any portion of the quality assurance program conducted in accordance with the requirements of Appendix B to this part; or

(ii) A significant deficiency in final design as approved and released for construction such that the design does not conform to the criteria and bases stated in the safety analysis report or construction permit; or

(iii) A significant deficiency in construction of or significant damage to a structure, system, or component which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function; or

(iv) A significant deviation from performance specifications which will require extensive evaluation, extensive redesign, or extensive repair to establish the adequacy of a structure, system, or component to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function.

(2) The holder of a construction permit shall within 24 hours notify the appropriate Nuclear Regulatory Commission Inspection and Enforcement Regional Office of each reportable deficiency.

(3) The holder of a construction permit shall also submit a written report on a reportable deficiency within thirty (30) days to the appropriate NRC Regional Office shown in Appendix D of Part 20 of this chapter. Copies of such report shall be sent to the Director of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. The report shall include a description of the deficiency, an analysis of the safety implications and the corrective action taken, and sufficient information to permit analysis and evaluation of the deficiency and of the corrective action. If sufficient information is not available for a definitive report to be submitted within 30 days, an interim report containing all available information shall be filed, together with a statement as to when a complete report will be filed.

(4) Remedial action may be taken both prior to and after notification of the Division of Inspection and Enforcement subject to the risk of subsequent disapproval of such action by the Commission.

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Reporting of Safety-Related Defects and Non-Compliances

HOUSTON LIGHTING & POWER

The Nuclear Regulatory Commission requires directors and responsible officers of certain firms and organizations to report defects in components and failures to comply with regulatory requirements that may result in a substantial safety hazard. The new regulations are identified as Title 10 Chapter I subchapter A of Federal Regulations - Energy - Part 21. They apply to firms that:

- Build, operate, or own NRC licensed facilities or conduct NRC licensed or regulated activities
- Supply safety-related components for NRC licensed facilities
- Supply safety-related design, testing, inspecting or consulting services for NRC licensed facilities

The following documents provide information relative to the reporting of safety-related defects and non-compliance:

A COPY OF 10 CFR PART 21 IS LOCATED AT THE MAIN FACILITY ENTRANCE AND AT SUPPLEMENTARY LOCATIONS THEREIN ON VARIOUS EMPLOYEE BULLETIN BOARDS, LOUNGE AREAS, ETC.

A COPY OF THE PROCEDURE FOR IMPLEMENTING 10 CFR PART 21 IS LOCATED

- 1) SUPERVISING PROJECT ENGINEER'S OFFICE/STP SITE
- 2) ENGINEERING DEPARTMENT, MANAGER'S OFFICE
8400 WESTHEIMER (HOUSTON)

ANY DEFECTS OR NONCOMPLIANCES WHICH COULD POTENTIALLY AFFECT THE SAFETY FUNCTIONS OF THE NUCLEAR POWER PLANT SHOULD BE REPORTED TO

- 1) SUPERVISING PROJECT ENGINEER/STP SITE
(812) 872-8446 X2200
- 2) MANAGER, ENGINEERING, 8400 WESTHEIMER (HOUSTON) (713) 993-1346

Parts of the Federal law and regulation concerning this requirement to report safety-related defects and non-compliance are:

PUBLIC LAW 93-438 ENERGY REORGANIZATION ACT OF 1974

"Sec 206(a) Any individual director, or responsible officer of a firm constructing, owning, operating, or supplying the components of any facility or activity which is licensed or otherwise regulated pursuant to the Atomic Energy Act of 1954, as amended, or pursuant to this Act, who obtains information reasonably indicating that such facility or activity or basic components subject to such facility or activity:

- (1) Fails to comply with the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order, or license of the Commission relating to substantial safety hazards; or
- (2) Contains a defect which could create a substantial safety hazard, as defined by regulations which the Commission shall promulgate,

shall immediately notify the Commission of such failure to comply, or of such defect, unless such person has actual knowledge that the Commission has been adequately informed of such defect or failure to comply.

(b) Any person who knowingly and consciously fails to provide the notice required by subsection (a) of this section shall be subject to a civil penalty in an amount equal to the amount provided by section 234 of the Atomic Energy Act of 1954, as amended.

(c) The requirements of this section shall be prominently posted on the premises of any facility licensed or otherwise regulated pursuant to the Atomic Energy Act of 1954, as amended.

(d) The Commission is authorized to conduct such reasonable inspections and other enforcement activities as needed to ensure compliance with the provisions of this section."

PUBLIC LAW 95-295 CRIMINAL PENALTIES FOR CERTAIN VIOLATIONS OF THE ATOMIC ENERGY ACT

"b. Any individual director, officer or employee of a firm constructing, or supplying the components of any utilization facility required to be licensed under section 103 or 106 b. of this Act who by act or omission, in connection with such construction or supply, knowingly and willfully violates or causes to be violated, any section of this Act, any rule, regulation, or order issued thereunder, or any license condition, which violation results, or if undetected could have resulted, in a significant impairment of a basic component of such a facility shall, upon conviction, be subject to a fine of not more than \$25,000 for each day of violation, or to imprisonment not to exceed two years, or both. If the conviction is for a violation committed after a first conviction under

this subsection, punishment shall be a fine of not more than \$50,000 per day of violation, or imprisonment for not more than two years, or both. For the purposes of this subsection, the term 'basic component' means a facility structure, system, component or part thereof necessary to assure -

- (1) the integrity of the reactor coolant pressure boundary,
- (2) the capability to shut-down the facility and maintain it in a safe shut-down condition, or
- (3) the capability to prevent or mitigate the consequences of accidents which could result in an unplanned off-site release of quantities of fission products as established by the Commission."

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ATTACHMENT 9.3
INSTRUCTION FOR COMPLETING A
DEFICIENCY EVALUATION FORM

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- | LINE NO. | INSTRUCTION |
|----------|---|
| 1 | The responsible SPE should assign and record form and revision number; enter date report received. |
| * 2 | Record the unit number(s) affected. Record the safety class and seismic category of the system, structure, or component. |
| 3 | Give a brief description of how the deficiency was discovered. Reference any deficiency related documents. |
| 4 | Record the title of the governing documents. |
| 5 | Record the requirement stated in the governing documents. |
| 6 | Describe the deviation and hazard as accurately and completely as possible. |
| 7 | Signature of the initiator and the date the form was prepared. |
| 8 | The SPE marks the appropriate "yes" or "no" block, signs and dates the DEF. Provide a short discussion of the basis for the determination. Distribution is made in accordance with Section 6.2. |
| 9 | The Manager, Engineering, marks the appropriate "yes" or "no" block, signs and dates the DEF. Provide a short discussion of the basis for the determination. The Manager, Engineering may simply concur with the reason provided by the SPE. Distribution is made in accordance with Section 6.4. |

* Steps 2 through 7 apply to DEF originator.

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ATTACHMENT 9.4

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NRC NOTIFICATION

Date _____ Time _____
 Individual notified at NRC _____
 Notified by _____ of H&P

FINAL REPORTABILITY DETERMINATION (10CFR50.55(e)): YES NO

There exists a deficiency in design or construction

AND

Deficiency represents a significant

(i) Breakdown in any portion of the QA Program (Per
10CFR50 Appendix B) _____

OR

(ii) Deficiency in final design as approved and released
for construction (does not conform to SAR or CP) _____

OR

(iii) Deficiency in construction or construction damage which
required extensive evaluation, redesign or repair _____

OR

(iv) Deviation from performance specifications which requires
extensive evaluation, redesign or repair _____

AND

Were it to remain uncorrected could have adversely affected the
safety of operations _____

There exists a reportable deficiency: _____

- Attach all necessary supporting documentation -

Comments: _____

NRC notification (if required by step 6.6.6)

Date _____ Time _____
 Individual notified at NRC _____ Notified by _____

IRC Chairman _____ Date _____

Reviewed _____
 Manager, Nuclear Licensing _____ Date _____

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ATTACHMENT 9.6
CONTENTS OF WRITTEN REPORT TO NRC

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If it is determined that the deficiency is reportable under 10CFR50.55(e), the written report will contain all of the information, to the extent known, required by regulation. The report shall include a description of the deficiency, an analysis of the safety implications and the corrective action taken, and sufficient information to permit analysis and evaluation of the deficiency and of the corrective action. If sufficient information is not available for a definitive report to be submitted within 30 days, an interim report containing all available information shall be filed, together with a statement as to when a complete report will be filed.

If it is determined that Part 21 is applicable, then the report shall contain the following information to the extent known:

- (i) Name and address of individual informing the Commission.
- (ii) Identification of the facility and the basic component which contains a defect or fails to comply.
- (iii) Identification of the firm supplying the basic component which contains a defect or fails to comply.
- (iv) Nature of the defect or failure to comply and the safety hazard which could be created.
- (v) Date on which information on the defect or failure to comply was obtained. (i.e., date the determination of reportability pursuant to 10CFR Part 21 was completed.)
- (vi) Number and location of all such components (includes other HL&P nuclear plants).
- (vii) Corrective action taken/to be taken, including responsibility for corrective action, schedule for corrective action or length of time taken to correct.

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ATTACHMENT 9.8
List of Responsible Individuals

Manager, STP

• Deputy Project Manager

General Manager, Nuclear Engineering

• Manager, Engineering (STP)

Manager, Nuclear Purchasing

• Manager, QA

• Manager, Project QA

Manager, Nuclear Services

Manager, Nuclear Fuel

Manager, Nuclear Licensing

Principal Engineer, STP

Special Coordinator

Supervising Project Engineer (Systems)

Supervising Project Engineer (Physical Design)

Supervising Engineer, STP Licensing

Supervisor, Project Design/Procurement QA

IRC Chairman