



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

July 2, 2002
NOC-AE-02001330

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Commitment Change Summary Report

Gentlemen:

Attached is the South Texas Project (STP) Commitment Change Summary Report for the period June 10, 2001 through June 10, 2002. This report lists each commitment for which a change was made during the reporting period and provides the basis for each change.

The commitments were evaluated in accordance with the requirements of STP's Regulatory Commitment Change Process, which is consistent with the guidance in the Nuclear Energy Institute's "Guideline for Managing NRC Commitments", NEI 99-04. Additional documentation is available at STP for your review.

If there are any questions, please contact either Scott Head at 361-972-7136 or me at 361-972-8757.

A handwritten signature in black ink, appearing to read "T. J. Jordan".

T. J. Jordan
Vice President,
Engineering & Technical Services

RDP

Attachment 1: Commitment Change Summary Report

cc:

(paper copy)

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ATTACHMENT 1

Commitment Change Summary Report

ATTACHMENT 1
COMMITMENT CHANGE SUMMARY REPORT
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Condition Report Number	Source Document	Source Date	Date of Change	Original Commitment Description	Revised Commitment Description	Justification for Change
01-8130 92-1324	HL-AE-4220 HL-AE-4254	09/23/92 11/13/92	07/15/01	A clear definition of TADOT will be formally documented by October 15, 1992.	The commitment was deleted because it was determined to be unnecessary.	<p>STP originally completed this action by providing a Technical Specification Interpretation (TSI-124). If questions arise in the future regarding what constitutes an adequate Trip Actuating Device Operability Test (TADOT), NRC Generic Letter 96-01 can be referenced for clarification.</p> <p>STP completed the actions required in NRC Generic Letter 96-01, "Testing Of Safety-Related Logic Circuits". Generic Letter 96-01 requested that licensees:</p> <ol style="list-style-type: none"> 1) Compare electrical schematic drawings and logic diagrams for the reactor protection system, emergency diesel generator load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including the parallel logic, interlocks, bypasses and inhibit circuits, are adequately covered in the surveillance procedures to fulfill the technical specification requirements, and 2) Modify the surveillance procedures as necessary for complete testing to comply with the technical specifications. <p>The completion of these actions make the clarification of the definition of a TADOT in Technucal Specifications unnecessary. If questions come up in the future regarding what constitutes an adequate TADOT, NRC Generic Letter 96-01 can be referenced.</p>
01-12331	Unknown	Unknown	08/01/01	STP's 10CFR50.59 Evaluations procedure indicated that STP made a commitment that all changes to the Operations Quality Assurance Plan (OQAP) would be evaluated pursuant to 10CFR50.59. The origin of the commitment was not determined.	The commitment was deleted because it was determined to be unnecessary. All changes to the Operations Quality Assurance Plan are evaluated pursuant to 10CFR50.54(a).	According to 10CFR50.59(c)(4), the provisions of 10CFR50.59 do not apply to changes to the facility or procedures when the applicable regulations establish more specific criteria for accomplishing such changes. All changes to the OQAP are subject to 10CFR50.54(a) and 10CFR50, Appendix B.
99-11276 01-2661	NOC-AE-01001028 NOC-AE-01001018 AE-NOC-01000780	02/08/01	08/30/01	Changes to the defensive strategy will be completed by September 4, 2001.	Revised commitment due date where implementation of the new defensive strategy was to be completed by no later than September 24, 2001.	The change in the defensive strategy represented a significant set of enhancements that were the culmination of extensive planning, assessments, and industry benchmarking. Although STPNOC determined that the new defensive strategy was an improvement, STPNOC's defensive strategy at the time, met security plan and regulatory requirements. Therefore, the slip in schedule of less than 30 days did not adversely impact the security program. The implementation of the new defensive strategy was actually completed on September 16, 2001.

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COMMITMENT CHANGE SUMMARY REPORT
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Condition Report Number	Source Document	Source Date	Date of Change	Original Commitment Description	Revised Commitment Description	Justification for Change
01-12074	HL-AE-2614	04/15/88	09/06/01	Various actions were taken to provide interim storage for Technical Specification (TS) surveillance packages within Plant Engineering Department in accordance with plant procedure OPGP03-ZA-0042. (A) A lockable, one hour fire rated filing cabinet has been provided. (B) A log has been established to track the removal of TS surveillance packages and provide an index of what is maintained in the file. (C) A records custodian has been designated. A memorandum was also issued from the Plant Manager to Department/Division Management requiring that interim storage be provided for documents containing critical information, including TS Surveillance Packages, when credit is taken for them. Divisions within the Nuclear Plant Operations Department which process TS Surveillance Packages after test coordinator approval will provide interim storage protection in accordance with OPGP03-ZA-0042 for the TS Surveillance Package. Plant procedure OPGP03-ZE-0004, "Plant Surveillance Program" has been revised to indicate the point at which TS Surveillance Packages are to be treated as Quality records.	The Records Management Procedure, OPGP07-ZA-0001 was revised to reflect requirements for the protection and storage of in-process documentation and completed records. The specific requirements include: (A) Departments generating required records are responsible for providing the appropriate controls to ensure that in-process documentation and completed records are afforded reasonable protection from loss and degradation; and (B) these controls, as applicable, should provide for adequate storage facilities or equipment, designation of responsible personnel, and methods of records inventory.	The station has matured to the point where department personnel are responsible for records in their possession (including in-process documentation and completed records), site buildings have fire protection systems, and processes governed by procedures that include approval and routing of documentation. Proliferation of electronic media also allows for regeneration. ANSI N45.2.9 states that a document is considered a quality assurance record when the document has been completed. Applicable Regulatory Guides/ANSI Standards do not define or describe the control of "active QA records". TS Surveillance packages temporarily maintained in the Control Rooms are being afforded reasonable protection (e.g. Control Room environment, manned 24 hours/day, limited access, fire suppression system, shift supervisor's log TS Surveillance package status).
02-797	Unknown	Unknown	03/03/02	STP's procedures and correspondence indicate that there may have been a commitment to notify the NRC Resident Inspector when the Post Accident Sampling System was out of service for greater than 7 days. The origin of the commitment was not determined.	The commitment was deleted because it was determined to be unnecessary.	License Amendment 133 for Unit 1 and 122 for Unit 2 deleted Technical Specification (TS) 6.8.3.d that specified requirements for the Post Accident Sampling System Program. Since there is no longer a TS requirement for PASS there is no need to notify the NRC Resident Inspector.
01-123-41	ST-HL-AE-950	05/05/83	05/30/02	All structural steel for Category I and Non-Category I structures will utilize structural bolts purchased to Category I requirements.	The commitment to purchase structural bolts for Non-Category I structures to Category I requirements was deleted because it was determined to be unnecessary.	The commitment was made years ago when the plant was under construction. The improper segregation of Category I and Non-Category I structural steel bolts in the field had allowed bolts purchased to a Non-Category I specification to be installed in Category I structures, contrary to project requirements. The conditions have changed, where only a fraction of the number of structural bolts that were used then, are being used today. Also, the warehouse has a better material controls program. The warehouse can segregate Category I and Non-Category I structural steel bolts just as it does any other Category I and Non-Category I material.