UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JAN 18 1979

Docket Nos. STN 50-498
and STN 50-499

Mr. E. A. Turner
Vice President
Houston Lighting and Power Company
P. O. Box 1700
Houston, Texas 77001

Dear Mr. Turner:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE SOUTH TEXAS FINAL SAFETY ANALYSIS REPORT (FSAR)

As a result of our continuing review of the South Texas FSAR, we find that we need additional information to complete our evaluation. The specific information required is in the area of quality assurance and the conduct of operations and is listed in the Enclosure.

To maintain our licensing review schedule for the South Texas FSAR, we will need responses to the enclosed request by May 21, 1979. If you cannot meet this date, please inform us within seven days after receipt of this letter of the date you plan to submit your responses so that we may review our schedule for any necessary changes.

Please contact us if you desire any discussion or clarification of the enclosed request.

Sincerely,

Olan D. Parr, Chief
Light Water Reactors Branch No. 3
Division of Project Management

Enclosure:
As Stated

cc w/enclosure:
See next page

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7901260 [redacted]

cc: Mr. D. G. Barker
Manager, South Texas Project
Houston Lighting and Power Company
P. O. Box 1700
Houston, Texas 77001

Mr. M. L. Borchelt
Central Power and Light Company
P. O. Box 2121
Corpus Christi, Texas 78403

Mr. R. L. Hancock
City of Austin
Electric Utility Department
P. O. Box 1088
Austin, Texas 78767

Mr. J. B. Poston
Assistant General Manager for Operations
City Public Service Board
P. O. Box 1771
San Antonio, Texas 78296

Mr. Jack R. Newman, Esq.
Lowenstein, Newman, Axelrad & Toll
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

Mr. Melbert Schwarz, Jr., Esq.
Baker & Botts
One Shell Plaza
Houston, Texas 77002

Mr. G. Hohmann
Westinghouse Electric Corporation
P. O. Box 355
Pittsburgh, Pennsylvania 15230

Mr. E. R. Schmidt
NUS Corporation
NUS-4 Research Place
Rockville, Maryland 20850

Mr. J. H. Pepin
Brown & Root, Inc.
P. O. Box 3
Houston, Texas 77001

Mr. Troy C. Webb
Assistant Attorney General
Environmental Protection Div.
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Mr. R. Gordon Gooch, Esq.
Baker & Botts
1701 Pennsylvania Avenue, N.W.
Washington, D. C. 20006

Director, Governor's Budget
and Planning Office
Executive Office Building
411 W. 13th Street
Austin, Texas 78701

ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

FOR THE REVIEW OF THE FSAR FOR THE

SOUTH TEXAS PROJECT, UNITS 1 AND 2

421.0 QUALITY ASSURANCE

421.5 (17.2.1) The last paragraph of 17.2.1.1.1 describes the HL&P organizational arrangement and relationships through the construction phase. Revise this part of the FSAR to show this information for the operations phase. Similarly, expand 17.2.1.1.2 to include other HL&P organizations involved in the operations phase. Particularly address the relationship between the QA personnel (under the Vice-President, Power Plant Construction and Technical Services) and operating personnel (under the Vice-President, Operations).

421.6 (17.2.2) Describe measures for communicating to all responsible organizations and individuals that quality policies, QA manuals, and procedures are mandatory requirements which must be implemented and enforced.

421.7 (17.2.2) Section 17.2.2.6 of the FSAR addresses indoctrination and training. Describe measures which assure that:

(1) Personnel responsible for performing quality-affecting activities are instructed as to the purpose, scope, and implementation of the quality-related manuals, instructions, and procedures.

(2) Personnel performing quality-affecting activities are trained and qualified in the principles and techniques of the activity being performed.

(3) The scope, the objective, and the method of implementing the indoctrination and training program are documented.

(4) Proficiency of personnel performing quality-affecting activities is maintained by retraining, re-examining, and/or recertifying.

(5) Methods are provided for documenting training sessions describing content, who attended, when attended, and the results of the training session.

421.8 (17.2) Describe controls which assure that appropriate Appendix B requirements will be applied to the preoperational test program.

421.9 (17.2.2) Describe provisions which assure that the NRC will be notified of changes to (1) the accepted SAR QA program description prior to implementation and (2) organizational elements within 30 days after announcement. (Note: minor editorial changes or personnel reassignments of a nonsubstantive nature do not require NRC notification.)

421.10 (17.2.3) The second paragraph of Section 17.2.3 addresses control of deviations from quality standards specified in procedures. Address the control of deviations from quality standards specified in design documents.

421.11 (17.2.3) Describe measures which assure that design errors and deficiencies that could adversely affect safety-related structures, systems, and components are documented and that corrective action is taken to preclude repetition.

421.12 (17.2.3) Describe whether the application suitability review, discussed in Section 17.2.3.2 of the FSAR, includes the use of valid industry standards and specifications.

421.13 (17.2.4) Steps 3 and 6 in Section 17.2.4.2 of the FSAR include QA Department review of procurement documents. Describe measures which assure that these reviews are documented and that they verify that quality requirements are correctly stated, inspectable, and controllable; there are adequate acceptance and rejection criteria; and the procurement document has been prepared, reviewed, and approved in accordance with QA program requirements.

421.14 (17.2.4) Item 1 of the third paragraph of Section 17.2.4.1 requires that design requirements be included or referenced in requisitions. Describe measures which assure that these design requirements include applicable material and component identification requirements, drawings, specifications, standards, inspection and test requirements, and special process instructions.

421.15 (17.2.5) Item 1 of Section 17.2.5.1 states that departmental procedures cover a number of areas. Plant operations is not included. Clarify this exclusion.

421.16 (17.2.6) Describe measures which assure that approved changes are included in instructions, procedures, drawings, and other documents prior to implementing the change and that documents are available at the location where the activity will be performed prior to commencing the work.

421.17 (17.2.6) Section 17.2.6.2 lists the types of documents controlled under 17.2.6 of the FSAR. Include the following types of documents in the list or justify their exclusion:

(1) Design specifications

(2) Procurement documents

(3) Modification procedures

(4) FSAR

(5) Manufacturing, inspection, and testing instructions

(6) Test procedures

(7) Design change requests

(8) Nonconformance reports and deviation notices

421.18 (17.2.7) Clarify that results of supplier evaluations are documented and filed and that suppliers are required to furnish the following records:

(1) Documentation that identifies the purchased material or equipment and the specific procurement requirements (e.g., codes, standards, and specifications) met by the items.

(2) Documentation that identifies any procurement requirements which have not been met together with a description of those nonconformances dispositioned "accept as is" or "repair."

421.19 (17.2.7) Item 3 of Section 17.2.7.1 addresses receipt inspection, but there is no mention of inspection of the hardware itself. Describe measures which assure that items are inspected and found to be acceptable in accordance with predetermined inspection instructions prior to installation or use.

421.20 (17.2.10) Describe measures which assure that inspection instructions or procedures and the necessary drawings and specifications are used when inspecting.

421.21 (17.2.11) Describe measures which assure that modifications, repairs, and replacements are tested in accordance with the original design and test requirements or acceptable alternatives and that test procedures include the acceptance limits of test results.

421.22 (17.2.12) Describe measures which assure that measuring and test equipment is labeled or tagged to indicate the date of the next calibration.

421.23 (17.2.14) Discuss the role of the QA organization in the control of inspection and welding stamps and other status indicators such as tags, markings, and labels.

421.24 (17.2.15) Discuss the role of the QA organization in controlling the installation of nonconforming materials, parts, and components. Also, describe the role of Engineering in the dispositioning of nonconformances.

421.25 (17.2.18) Describe measures which assure that audits, both onsite and offsite, include the objective evaluation of (1) work areas, activities, processes, and items; (2) documents and records; (3) quality-related practices, procedures, and instructions; and (4) implementation of the quality-related practices, procedures, and instructions. Provide a commitment that audited areas include:

(1) Operation, maintenance, and modification.

(2) The preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings.

(3) Receiving and plant inspections.

(4) Indoctrination and training programs.

421.25 (cont'd) (17.2.18)

(5) The implementation of operating and test procedures.

(6) Calibration of measuring and testing equipment.

421.26 (17.2.18)

Describe measures which assure that audit data are analyzed and the results, which indicate quality trends and the effectiveness of the QA program, are reported to management for review and assessment.

421.27 (17.2)

The first sentence on page 17.2-19 (Amendment 2) needs clarification (something is missing). Provide clarification.

421.28 (17.2)

Amendment 2 to the FSAR deleted the following items from Chapter 17 of the FSAR:

Location	Item
(1) 17.2.11.1, last paragraph	PORC approval of maintenance and test procedures.
(2) 17.2.11.3	Identification of those responsible for review and evaluation of test data.
(3) 17.2.13, third paragraph	Identification of those responsible for surveillance of stored items.
(4) 17.2.14, first paragraph	PORC approval of plant procedures
(5) 17.2.14, item 4	Requirement that bypassing of inspections, tests, and operations requires Plant Superintendent's permission and Plant QA Supervisor's concurrence.
(6) 17.2.15.2, fourth paragraph	Entire paragraph on NCR dispositioning.
(7) 17.2.16.1, fourth paragraph	Entire paragraph on DR corrective action.

Reinstate these items or justify their deletion.

421.29 (17.2.1)

Include the quality-related functions of the Operations Department in Section 17.2.1.1.2 of the FSAR.

422.0 CONDUCT OF OPERATIONS

422.2 (13.1.1.1) Describe your plans for providing offsite technical support for the operation of STP in the areas of chemistry and radiochemistry.

422.3 (13.1.1.1) Provide the number of professional personnel reporting to the Principal Engineer, Supervisor Health Physics, and Supervising Engineer of the Nuclear Division; and STP Project Manager.

422.4 (13.1.1.4) Provide the personal resume of the Director of Nuclear Fuels.

422.5 (13.1.2.2) Describe the responsibilities of the Chemical Analysis Foreman and his staff and the Health Physicist.

422.6 (13.1.2.2) You describe in Section 13.1.2.2.18 the responsibilities of the Plant QA Supervisor, but do not show this position on Figure 13.1-8 (Station Organization Chart). Clarify this apparent inconsistency.

422.7 (13.1.3.1) Describe the qualification requirements (in detail or by reference to an ANSI N18.1 position) for the positions of Operating Coordinator, Chemical Supervisor, Chemical Operations Foreman, Electrical and Mechanical Supervisor, Operations (reporting to the Chemical Operations Foreman), Chemical Technicians, and R.P. Technicians.

422.8 (13.1.3.1) In Table 13.1-2, you list the number of years of "other applicable" experience for the positions of Technical General Supervisor down through the position of Journeyman, I&C. This listing of experience requirements under the general heading "other applicable" does not provide enough information. Therefore, for each position listed in Table 13.1-2 from Technical General Supervisor down through Journeyman, I&C, except for the position of Radiation Protection Supervisor, provide a description of "other applicable" experience.

422.9 (RSP)
(13.1.3.1)

The qualification requirements you describe for the position of Radiation Protection Supervisor are not satisfactory. We require that the qualification requirements for this position meet those described in Revision 1 to Regulatory Guide 1.8, which are a Bachelor's Degree or the equivalent in a science or engineering subject, including some formal training in radiation protection and at least five years of professional experience in applied radiation protection. (A Master's Degree may be considered equivalent to one year of professional experience, and a Doctor's Degree may be considered equivalent to two years of professional experience where course work related to radiation protection is involved.) At least three years of this professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, preferably in an actual nuclear power station. State your intent with regard to this position.

422.10
(13.1.3.2)

Provide the personal resumes of the persons filling the positions of Reactor Engineer and Watch Supervisor, Nuclear.