

910



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

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

MAR 18 1980

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 is listed in the Enclosure.

Please inform us when you plan to submit your responses to this request. If you desire any discussion or clarification of the enclosed request, please contact us.

Sincerely,

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

Enclosure:
As stated

cc: See Next Page

Mr. E. A. Turner

MAR 18 1980

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. A. T. Parker
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. R. Geurts
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

John L. Anderson
Oak Ridge National Laboratory
Union Carbide Corporation
Bldg. 3500, P. O. Box X
Oak Ridge, Tennessee 37830

Resident Inspector/South Texas NPS
c/o U. S. NRC
P. O. Box 910
Bay City, Texas 77414

ENCLOSURE

SOUTH TEXAS PROJECT (50-498 & 499)

- 421.40 Item 421.32 will be carried as an open item. It is the staff position that programmatic changes by the Houston Lighting & Power Company to the South Texas Project quality assurance program are to be submitted to the NRC for review prior to implementation. Organizational changes are to be submitted no later than 30 days after announcement.
- 421.41 The response to item 421.34 on pages 17.2-16 and 17.2-20b and amendment 9 on page 17.2-22 (part 17.2.10.1) indicates that maintenance personnel will perform "maintenance receipt inspection (dimensional checks, electrical checks, precalibration checks, etc....)" and inspections of modifications, repairs, and replacements. It is the staff position that these inspections be performed by the Plant QA Staff in order to assure sufficient independence of the inspector from the individual whose work is being inspected and from undue influence from cost and schedule. Revise the FSAR to meet this position or provide an alternative for our evaluation. Note this position also affects pages 17.2-7, 17.2-8, 17.2-21, and 17.2-23 of amendment 9 relative to authority for inspection; therefore, revise these pages accordingly.
- 421.42 Item f on page 17.2-21 indicates that procedures require "Timely processing of receipt inspection (generally prior to installation or use)." It is the staff position that timely processing of receipt inspection is inspection upon receipt, and the parenthetical words tend to contradict this position. Revise this item to reflect the staff position.
- 421.43 The response to item 421.36 on page 17.2-26 indicates that procedures will provide for administrative control of radiography inspection stamps, verification of the application of welding stamps, and administrative control of reject and hold tags used in the plant. Clarify the role of the QA organization in these activities. Also, limiting the first commitment to radiography inspection stamps could mean that these are the only inspection stamps used in the plant, or it could mean that other inspection stamps are not similarly controlled. Clarify.
- 421.44 Describe the qualification prerequisites for Technical Section positions which provide confidence that this section is sufficiently independent and technically qualified to adequately perform an engineering evaluation of nonconformances which are recommended to be repaired or used-as-is by the cognizant plant supervisor. (See response to questions 421.24, 421.28, and 421.37 on page 17.2-28.)
- 421.45 The second paragraph of the response to item 421.38 states:
- "The Plant QA Supervisor is a member of the PORC; his presence is required for a quorum. Since PORC reviews all safety-related procedures, adequate QA review is assured."

We disagree. First, we find nothing in the FSAR that indicates that the presence of the Plant QA Supervisor is required for a quorum of

the PORC. Section 13.4.1 indicates only that "Formal meetings of the PORC require a quorum of 5 (out of 8) members" in this regard. Second, it is the staff position that the Plant QA Supervisor, individually or through his staff, review and approve all safety-related procedures independent of the PORC, where the Plant QA Supervisor has but one vote out of five-to-eight total votes. Revise the FSAR to meet this position or provide an alternative for our evaluation.

421.46 The third and fourth paragraph of the response to item 421.38 state:

1. "...the particular individuals responsible for review and evaluation of test data will be identified in the Plant Procedures."
2. "...the particular individuals responsible for periodic surveillance of stored items will be identified in Plant Procedures."

Identify these individuals (by position title and/or reporting relationship) in the FSAR.

421.47 Regarding the fifth paragraph of the response to item 421.38, we do not agree that the FSAR commitment per Revision 2 meets item 2 of acceptance criteria 14 of the Standard Review Plan (SRP). The SRP requires that "Bypassing of required inspections, tests, and other critical operations is procedurally controlled under the cognizance of the QA organization." Revision 2 of the FSAR states, in this regard, that procedures will provide "Identification of inspections, tests, and operations which may not be bypassed without the cognizance of the plant QA staff." While the two quotations could be interpreted to mean the same thing, we think they could also be interpreted differently in that the SRP addresses procedures for QA cognizance of bypassing whereas the FSAR addresses procedures for identifying activities which may not be bypassed without QA cognizance. While the differences may be slight, we require that the FSAR include a clear commitment to the SRP requirement.

421.48 FSAR Amendment 9 changed the commitment to Regulatory Guide 1.33 on page 17.2-6 from Revision 2 of the regulatory guide to Revision 1. Since Revision 1 was issued "For Comment" and Revision 2 "reflects current (2/78) NRC practice," we require a commitment to Revision 2. Revise the FSAR accordingly.

421.49 Replace or justify the deletion of "and approval" from item 4 on page 17.2-17 which, in amendment 4, stated "After QA review and approval, the requisition is returned to the Plant Superintendent or the General Manager of the Generation Engineering Department (or their respective designees) for final approval." In lieu of "approval," "documented concurrence" would be an acceptable alternative.

421.50 Explain the significance of deleting ", instructions, and drawings" from the paragraph preceding 17.2.7 on page 17.2-20A which, in amendment

4, stated: "Safety-related plant procedures, instructions, and drawings are reviewed by the Plant Operations Review Committee prior to issuance for use."

- 421.51 On page 17.2-26a, the first sentence is not clear and the second paragraph appears to mix "offsite activities" with "Nonconformance in the Plant." Clarify.
- 421.52 Explain the significance of the changes at the middle of page 17.2-29 which amendment 9 revised from: "Corrective action for problems identified by DN's are documented by the cognizant plant supervisor on the DN form. The plant QA staff verifies that satisfactory correction action has taken place by reinspection or audit. Un-acceptable corrective action, as determined by the plant QA staff, requires further action by the responsible supervisor and may result in suspension of the deficient activity." to "Corrective action for problems identified by DN's are determined by the cognizant plant supervisor on the DN form. The plant QA staff verifies satisfactory completion of the corrective action by reinspection or audit. Un-acceptable completion of corrective action, as determined by the plant QA staff, requires further action by the responsible supervisor and may result in suspension of the deficient activity." Also, it is the staff position that the QA organization concur with the corrective action. Revise the FSAR to meet this position or provide an alternative for our evaluation.