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February 28, 1980  
ST-HL-AE-425  
SFN: V-0110

Mr. Karl V. Seyfrit, Director  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATION  
STATION DOCKET NOS. 50-498 AND 50-499

RE: ST-HL-AE-401 (December 28, 1979)  
ST-HL-AE-409 (January 25, 1980)

Dear Mr. Seyfrit:

We are providing the following update of our nine point action program as identified in our letter of December 28, 1979 and subsequent status report of January 25, 1980.

ACTION ITEMS 1, 2, 3, 5, 6, 7 and 8 - All actions have been implemented in accordance with the referenced letter of January 25, 1980.

ACTION ITEM 4 - A MANAGEMENT ASSESSMENT OF THE OVERALL QUALIFICATIONS OF THE BROWN & ROOT QA AND QC PERSONNEL WILL BE COMPLETED BY THE END OF JANUARY, 1980, TO PROVIDE THE BASIS FOR UPGRADING THE CALIBER OF PERSONNEL. OUR PERSONNEL WILL BE INVOLVED IN THIS EVALUATION WITH BROWN & ROOT MANAGEMENT.

STATUS: An assessment of the overall qualifications of the Brown & Root QA and QC personnel has been completed. To place additional emphasis on the overall qualifications of personnel being certified to perform inspection and testing for the South Texas Project, we plan to:

1. Continue the certification program started in October, 1979, for each individual and thus require higher minimum experience levels.
2. Reduce the ratio of less experienced entry level personnel to qualified inspectors in future employment practices.

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3. Require confirmation of the qualifications of QA/QC personnel prior to certification.
4. Continue the QA/QC and construction refresher training programs initiated in January, 1980.
5. Improve internal communications within the QA/QC and construction organizations.
6. Continue to observe and evaluate the performance of project personnel and take required action necessary to strengthen and improve performance.
7. Implement a new salary administration program for QA/QC inspectors.
8. Require the discipline supervisors within QA/QC to be certified in all areas of their responsibility.

As a result of the review of all Brown & Root QA/AC personnel (152) we have identified several individuals that had discrepancies in either their education or work experience background. These individuals have not been allowed to continue their inspection responsibilities. We informed NRC Region IV personnel (Messrs. Seidel, Crossman and Hall) on February 21, 1980 that those personnel who do not as yet have confirmation of education and work experience are considered qualified to perform their respective functions based on previous examinations and documented proficiency. In order to ensure complete closure of the problem with verification of work experience and education, Nonconformance Report (NCR) H-0311 has been issued. In the future, personnel qualifications will be confirmed prior to certification. Actions originally identified as Action Item #4 have been implemented.

ACTION ITEM 9 - AN ASSESSMENT WILL BE MADE STARTING WITH TOP LEVEL MANAGEMENT AND PROCEEDING THROUGHOUT THE BROWN AND ROOT ORGANIZATION TO DETERMINE THE CAUSE OF THE PERCEPTION OF HARASSMENT OR UNDUE PRESSURE ON QC PERSONNEL. CHANGES WILL BE MADE AS RESULTS OF THE ASSESSMENT ARE CLEAR AND CONCLUSIONS CAN BE DRAWN. WE EXPECT TO COMPLETE THIS ASSESSMENT WITHIN THIRTY DAYS.

STATUS: Timelapse, Incorporated, a professional consultant was commissioned to conduct an independent survey of both QA/QC and Construction personnel to determine the cause of the perception of harassment or undue pressure on site QA/QC personnel. This assessment concluded that the

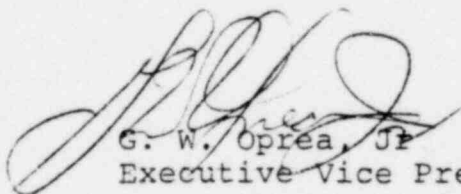
perception of harassment on QC personnel could have existed in the past because of instances of confrontation between Construction and QC personnel. Each of these instances in themselves was not especially significant, but taken together it was possible that site QC personnel perceived there to be a pattern of harassment and confrontation.

The Timelapse assessment and further investigation and evaluation by the Contractor resulted in the following actions by the Contractor:

1. Re-emphasis of the role of QA/QC to the Construction Team.
2. Additional refresher training, seminars, meetings, etc. to strengthen the role and understanding of QA/QC.
3. A complete revamping of the Contractor's salary administration program for QA/QC at the Site.
4. An improved and more open communication by the QA/QC management at normal site meetings and with all levels of employees.

Based upon the full implementation of our nine point action program, we would propose to begin the placement of safety related complex concrete on March 3, 1980.

Very truly yours,



G. W. Oprea, Jr.  
Executive Vice President

WNP:rpv

cc: Messrs. E. A. Turner  
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