

# The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

October 15, 1980  
ST-HL-AE-534  
SFN: V-0100

Mr. Harold R. Denton  
Director, Office of  
Nuclear Reactor Regulation  
Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

South Texas Project  
Units 1&2  
Docket Nos. STN 50-498, STN 50-499  
Quality Assurance Program  
Response to NRC Requests

This is in response to your letter of September 24, 1980, regarding the Quality Assurance Program for the design and construction of the South Texas Project. Our response reflects the conversations and discussions referred to in your letter as well as more recent discussions with NRR and I&E Regional Staff.

The new QA program and organizations as described in our submittals of May 23, 1980, and July 28, 1980, and as explained further at the public meeting on August 19, 1980, will be documented, per your request in a filing in the format in Regulatory Guide 1.70, Revision 3. This filing will be submitted on October 31, 1980.

The Quality Assurance program has been strengthened through the modifications described in our response to the Show Cause Order and in meetings with Region IV. The modifications generally represent changes in both Brown & Root and Houston Lighting & Power organizational structure, the addition of more experienced QA personnel to both Brown & Root and Houston Lighting & Power organizations, and relocation of the Brown & Root Quality Engineering function to the job site. This has improved the implementation of the inspection activities at the working level by improving planning and coordination with the construction activities.

Concurrently with the development of improved procedures to control QA activities, we have implemented the then-existing QA program with modifications that have been documented. Procedural requirements have been carefully monitored by our QA personnel.

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I believe that through major changes in our QA program which will be reflected in our filing on October 31, 1980, we are providing to Brown & Root substantially improved programmatic direction. As indicated in the submittals discussed above, I am now devoting essentially all of my time to the South Texas Project. The HL&P QA Department Manager has assumed full-time responsibility as the Project QA Manager and has been assigned to the site. As reflected in our earlier commitments, the Project QA Manager reports directly to me, and I have devoted not less than two days each week to meetings at the site.

Brown & Root management has intensified its own commitment to an effective quality assurance program.

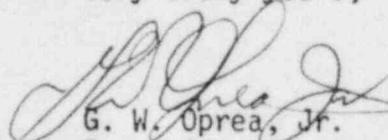
- The Brown & Root Senior Vice President, Power Operations, is devoting most of his time to the South Texas Project and is making regular visits to the site.
- The Quality Assurance Management Review Board, which is composed of senior officers of the Brown & Root Power Group, is holding periodic meetings at the project site.
- The Brown & Root Corporate Quality Assurance Manager is making monthly reports to the Brown & Root Board of Directors on the status of the quality assurance program for the South Texas Project.

These steps by HL&P and B&R management reflect the increased role that management is playing in the STP QA program.

The Brown & Root QA reorganization described in our submittals of May 23, 1980, and July 28, 1980, as discussed at the August 19, 1980, public meeting has been implemented under the leadership of a fully qualified QA Manager who has been assigned to the site. The new organization is operating pursuant to instructions issued in September, 1980, specifically the documents entitled "STP Quality Engineering Organization" and "Quality Development and Implementation." Parent documents regarding the organizational structure--the B&R "Quality Assurance Manual" and the B&R "Quality Assurance Procedure 1.1"--are being revised and will be issued effective October 20, 1980.

Should you have any questions, please advise.

Very truly yours,



G. W. Oprea, Jr.  
Executive Vice President

GWO:jow

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