U. S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT REGION IV

Report: 50-498/81-15; 50-499/81-15

Dockets: 50-498; 50-499

Categor; A2

Licensee: Houston Lighting and Power Company

Post Office Box 1700 Houston, Texas 77001

Facility Name: South Texas Project, Units 1 and 2

Inspection at: South Texas Project, Matagorda County, Texas

Inspection conducted: April 20-24, 1981

Inspectors: W. 94 Dubacun
W. G. Hubacek, Reactor Inspector, Projects Section 3

Approved: W. A. Crossman, Chief, Projects Section 3

Inspection Summary

Inspection on April 20-24, 1981 (Reports 50-498/81-15; 50-499/81-15)

Areas Inspected: Unannounced inspection of licensee corrective action in response to the Show Cause Order and previous inspection findings. The inspection involved 35 inspector hours by one NRC inspector.

Results: No violations or deviations were identified.

## DETAILS

## 1. Persons Contacted

## Principal Licensee Employees

\*R. A. Frazar, OA Manager

\*L. D. Wilson, Project QA Supervisor, Mechanical

T. J. Jordan, Supervisor, Quality Systems

#### Other Personnel

\*C. L. Harvey, Consultant to Houston Lighting and Power Company (HL&P), Gilbert Commonwealth

D. J. Harris, Quality Engineering Manager for Brown & Root (B&R), Management Analysis Company

T. L. Porfilio, Design Quality Engineer, B&R

The NRC inspector also contacted other licensee and contractor employees including members of the QA and engineering staffs.

\*Denotes those attending the exit interview on April 24, 1981.

# 2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (50-498/79-19-44; 50-499/79-19-44) Review of documentation involved with receiving documentation for some vendors. Corrective action for this item has been incorporated into action to correct a construction deficiency related to a breakdown in the B&R Quality Program for the procurement cycle of purchased materials which was reported to the NRC on June 13, 1980, in accordance with the requirements of 10 CFR 50.55(e). Future NRC review of this matter will be conducted during followup inspections related to the construction deficiency; therefore, this unresolved item is considered closed.

# Licensee Action On Show Cause Order Items

(Open) Show Cause Order Item V.A.(7): The licensee shall develop and implement a more effective system to provide for control of field changes in order to assess the impact of the changes on design.

The NRC inspector reviewed implementation of the commitments in the licensee's response to this Show Cause Order item by discussions with licensee and contractor representatives and by inspection of objective evidence related to commitments described in the attachment to HL&P letter ST-HL-AE-533, dated September 18, 1980. The following commitments, utilizing the identification numbers in the attachment to the HL&P letter, were reviewed:

(Open) Item A131: Qualification and training records will be maintained on Project Site Engineers and QEs. Qualification records maintained on site were incomplete. This item will remain open pending receipt of additional records from the Houston office of B&R Engineering and subsequent review during a future NRC inspection.

(Open) Item Al36: Each morning, a computer printout will be provided to users of the design documents. The NRC inspector observed that the licensee had not yet clarified the requirements regarding time and frequency of issue of the computer printouts. Actual practice has been to distribute the computer printouts on a daily basis during the scheduled work week. This matter will remain open pending issuance of the clarification and subsequent review during a future NRC inspection.

(Open) Item Al37: When construction of an item has been completed, as-built verification checklists will be prepared and their correctness will be verified by Design and Quality Engineering. This checklist will be used by the inspector for final acceptance. The NRC inspector observed that B&R Procedure ST-QAP-3.2 "As-Built Verification" has been developed and submitted to HL&P for review and approval prior to issuance for site use. This item will remain open pending issuance and implementation of the procedure and subsequent review during a future NRC inspection.

(Closed) Item Al39: An evaluation of the program will be performed to determine if minor changes are required. The NRC inspector observed that evaluation of the program has been performed and continues to be performed as an ongoing process. Several procedure changes have resulted from the evaluation.

(Closed) Item A140: Any FREAs not approved by October 1, 1980 will be treated as Field Change Requests (FCRs) and will be processed accordingly. The NRC inspector observed that the FREAs are being processed as FCRs in accordance with Procedure STP-DC-023.

(Closed) Item M37: All procedures for control of field changes will be issued by October 1, 1980. The NRC inspector observed that the basic procedures required for implementation of the field change system were issued prior to October 1, 1980. These procedures included Engineering Procedures STP-DC-023, STP-DC-028, STP-DC-029 and Construction Procedure GCP-21. Since October 1980, revisions to Procedure STP-DC-023, STP-DC-028 and GCP-21 have been issued and Procedure STP-QAP-3.2 has been developed and submitted to HL&P for review and approval prior to issuance for site use. In view of the fact that refinement of the existing procedures is an ongoing process and that the basic procedures for the control of field changes are in place, this item is closed.

(Closed) Item M38: A training seminar is being prepared and will be presented to all B&R members of the project who will participate in this program. The NRC inspector reviewed training records maintained by Project Site Engineering (PSE) and the Site Training Department which indicated that the training seminar was presented in September 1980, to B&R personnel who participate in the field change program. Makeup training has been provided for employees who did not attend the initial training seminar and recently assigned employees.

In addition to the above items, the NRC inspector reviewed implementation of Procedures STP-DC-023 "Processing Field Changes," STP-DC-028 "Design Control" and STP-DC-029 "Change Review Board Activities" by discussions with cognizant B&R PSE personnel and observation of related activities. The PSE activities were consistent with the requirements of these procedures.

# 4. Exit Interview

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The NRC inspector met with licensee representatives (denoted in paragraph 1) on April 24, 1981. The NRC inspector summarized the purpose and scope of the inspection and the findings.