The Light

Company
South Texas Project Electric Generating Station P. O. Box 289 Wadsworth Texas 77483

October 9, 1990 ST-HL-AE-3599 File No.: G20, Z10

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

> South Texas Project Electric Generating Station Unit 1 Docket No. 50-498 Operational Readiness Inspection Observation #24

Reference: Letter from G. E. Vaughn to Document Control Desk, dated March 18, 1988 (ST-HL-AE-2584)

Observation #24 noted a need to establish an improved method for cross-referencing surveillance procedures to other affected Technical Specifications. In the above referenced correspondence Houston Lighting & Power Company (HL&P) had committed to operate and maintain a Limiting Condition of Operation (LCO) Tracking System computer, alternatively known as the Technical Specification Management System (TSMS).

This system has become less than acceptable as the preferred method of tracking LCO's and surveillances. This situation has arisen due to a lack of maintainability of data to current versions of Technical Specifications, lack of user friendliness and corresponding lack of use. The system would require significant and costly upgrades to be functional at a usable level of confidence.

In addition, alternative means of tracking LCO entries and surveillances are adequate to ensure the compliance with Technical Specifications in this regard. The Operability Tracking Log is a procedurally controlled manual system where all Technical Specifications required equipment is tracked until restoration. Any surveillance conditional to the equipment's inoperability are also tracked, with each performance separately entered. These entries are reviewed by Senior Reactor Operator Licensed personnel. Also, routine and conditional surveillances are tracked under the control of the Plant Surveillance Scheduling procedure. This program establishes controls for a surveillance database which includes cross-references to the corresponding Technical Specifications.

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Houston Lighting & Power Company South Texas Project Electric Generating Station

ST-HL-AE-3599

File No.: G20, Z10

Page 2

These methods meet the intent of the original commitment to provide a tracking means for cross-referencing surveillance procedures to Technical Specifications and ensuring the tests are conducted. We note also that these additional methods have been in place for some time and have been reviewed during previous NRC inspections.

If you should have any questions on this matter, please contact myself at (512) 972-8530 or C. A. Ayala at (512) 972-8628.

M. A. McBurnett

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Houston Lighting & Power Company South Texas Project Electric Generating Station

ST-HL-AE-3599 File No.: G20, Z10 Page 3

cc:

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