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Mr. Lanny Sinkin
838 E. Magnolia Avenue
San Antonio, Texas 78212

In the Matter of
Houston Lighting and Power Company
(South Texas Project, Units 1 & 2)
Docket Nos. 50-498 and 50-499

Dear Mr. Sinkin:

Enclosed are the documents you requested during the final week of the hearing in this case. The Systematic Assessment of Licensee Performance (SALP, 81-37) was sent to the Board under separate cover today. The other documents are simply summaries of I&E Reports, the majority of which have already been admitted to the record and summarized in Staff testimony. Accordingly, the Staff would oppose any motion to reopen the record for purposes of admitting these documents.

Should you have any questions concerning these documents, please do not hesitate to contact me.

Sincerely,

Jay M. Gutierrez
Counsel for NRC Staff

Enclosure: As Stated

cc: (w/enclosure)
Maurice Axelrad
Brian E. Berwick
Peggy Buchorn
Glen Madsen
Edward Shoemaker

DS07

OFC	:OELD	:OELD	:	:	:
NAME	:JGutierrez/dkw	:EReis	:	:	:
DATE	:06/28/82	:06/28/82	:	:	:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION IV
611 RYAN PLAZA DRIVE SUITE 1000
ARLINGTON, TEXAS 76012

January 4, 1977

W. A. Crossman, Chief, Projects Section

TREND ANALYSIS - 1976

The start of a new year is a good time to step back and take a look at the performance of our assigned licensees during the past year. If, in our evaluation, we detect negative trends, then we should promptly arrange through regional supervision to discuss these findings with corporate management.

Please request your Facilities Inspectors to conduct a trend analysis of the performance of each of their assigned "active" licensees during calendar year 1976. Specific areas to be considered should include:

- Number and repetitiveness of Construction Deficiency Reports.
- Enforcement history, e.g., number and repetitiveness of non-compliance items.
- Responsiveness of licensee to enforcement action.
- Number of outstanding unresolved items - timeliness of resolution.
- Corporate management involvement in regulatory matters.
- Effectiveness of QA/QC programs.
- Any other trends indicative of poor performance.

Please forward your written evaluations to me be COB January 28, 1977.

W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch

cc: R. E. Hall
W. E. Vetter

9704280378

TREND ANALYSIS

1976

REACTOR CONSTRUCTION BRANCH

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

January 14, 1977

MEMORANDUM FOR: W. G. Hubacek
R. G. Taylor
R. C. Stewart
C. R. Oberg

FROM: W. A. Crossman, Chief, Projects Section

SUBJECT: TREND ANALYSIS - 1976

Enclosed is a memo from Bill Seidle concerning licensee performance trend analysis. To answer his questions please provide the following CY 76 information.

a. Number and Repetiveness of Construction Deficiency Reports

(I have this information already)

b. Enforcement History

For each facility list:

(1) Inspection Report Number
(2) Dates of Inspection
(3) Number of Violation
(4) Number of Infractions
(5) Number of Deficiencies
(6) Number of Deviations
(7) Mandays involved (for that inspection)
(8) Remarks (indicate if repeat from 1976 and 1975)
(9) Number of outstanding unresolved items

c. Responsiveness of Licensee to Enforcement Action

(1) Is licensee on time with answer to our letter?
(2) Are answers adequate? Do we have to go back for more information?
(3) Is corrective action done promptly?
(4) Are any inadequate answers our fault?
(5) Is the licensee responsive in your opinion? Why?

d. Number of Unresolved Items - Timeliness Resolution

(1) Numbers are given in b.(9) above.
(2) Are unresolved items cleared rapidly?
(3) Average time to clear.
(4) Are numbers/inspection on the increase? Why?

e. Corporate Management Involvement in Regulation Matters

(1) Sufficient management representation of exits?
(2) Attitude receptive?
(3) Signature on licensee letters appropriate level?
(4) Is management involved? (indicate basis for answer)

f. Effectiveness of QA/QC Program

This is a very subjective matter. I desire your own opinion and what you base your opinion on. If too early in construction phase to state, indicate this. Also indicate what you believe we can do to have them improve their program.

g. Any Other Trends Indicative of Poor Performance

List and discuss any other indications that may point out poor/good performance.

As a last item, give me your general recommendation on advisability of holding a periodic management meeting with all licensees to discuss past performance and identify possible problems for the licensee to avoid.

As indicated in the enclosure, this is to be your assessment of your "active" facilities. Please have your information to me by COB on January 25, 1977.

W. A. Crossman, Chief
Projects Section

Enclosure:
As stated

cc: W. C. Seidle

TREND ANALYSIS

SOUTH TEXAS, UNITS 1 & 2

b. Enforcement History

See attachment

c. Responsiveness of Licensee to Enforcement Matters

(1) Yes

(2) On the basis of one completed correspondence cycle - yes they are adequate.

(3) Yes

(4) Not applicable

(5) Yes - licensee personnel, while well qualified, are somewhat inexperienced at QA and have expressed appreciation for the occasional suggestion on how to head off problems.

d. Number of Unresolved Items - Timeliness Resolution

(1) In b above

(2) Yes

(3) General one inspection cycle.

(4) No

e. Corporate Management Involvement

(1) Both licensee and general contractor site management and usually the licensee's home office project QA manager attend the exits.

(2) Very

(3) Executive Vice President appears adequate.

(4) I believe licensee management is very involved. The impression is that the executive VP is of the opinion that their program should be good enough that we will have no negative findings.

f. Effectiveness of QA/QC Program

It appears that the licensee has gathered a group of technically sound, agressive people to maintain surveillance over the general contractor who has line level QA/QC responsibility. The general contractor (Brown & Root)

QA/QC appears to have an adequate program but has some reluctance to exercise its authority. Few strong positions are taken unless the licensee provokes action.

Programmatically both the licensee and Brown & Root are quite adequate. The only real solution(s) are:

(1) The licensee take over full QA/QC responsibility with B&R having none, or

(2) Replace B&R QA/QC site management and perhaps some home office management with personnel with more intestinal fortitude.

g. Any Other Trends

As a further point on f above, it was the licensee who provoked B&R QA into taking action against PDM. B&R supported the December 30, 1976, Stop Work Order with a very weak group of descrepancies uncovered by an audit performed that day, but had been maintaining full time surveillance over PDM for six weeks. It has always been axiomatic that it is far easier to be agressive and firm with subcontractors than with your companies' construction forces for obvious reasons such as continued employment. Here we have the situation where B&R QA could not bring it upon themselves to take effective action with a subcontractor. What is probable when B&R begins the more difficult and important work involving piping and electrical systems? I think we wait and see.

I see no reason for periodic senior level management meetings. Management meetings should be reserved for actual need so as to keep high visibility status.

b. ENFORCEMENT HISTORY

FACILITY South Texas, Units 1 & 2

Report No.	Insp. Dates	Viol.	Infr.	Def.	Dev.	Man Days	Unres. Items	Remarks
76-01	1/29-30					2		Env. Inspection
76-02	4/21-23					9	1	
76-03	6/16-18		1			6	2	(Unit 1, Inf. Only)
76-04	8/10-13					4		
76-05	9/21-24					8		
76-06	10/4-7					4	1	
76-07	11/30-12/3		1			12	1	

REGION
611 RYAN PLAZA DRIVE
ARLINGTON, TEXAS

October , 197

MEMORANDUM FOR: K. V. Seyfrit, Director

FROM: W. C. Seidle, Chief, RC&ES Branch

SUBJECT: USE OF LICENSEE PERFORMANCE EVALUATION INFORMATION, MEMO 10/3/78, DAVIS TO SEYFRIT

In response to the subject memorandum, the attached Trend Analysis information generated for those facilities assigned to the RC&ES Branch during the year 1976 and 1977 is provided for your information. I initiated this on-going analysis in my memorandum to W. A. Crossman dated January 4, 1977, a copy of which is attached. You will note in Crossman's implementation memorandum of January 6, 1978, page 2, paragraph f (copy attached) that I discuss each facility with the assigned project inspector.

If you have any specific questions regarding this matter, I would be pleased to discuss them with you.

W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch

Attachments:
Memo dated 1/4/77, W. C. Seidle to W. A. Crossman
Memo dated 1/6/78, W. A. Crossman to Project Inspectors
Trend Analysis Book - 1976 and 1977

8701280387

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DR. SUITE 1000
ARLINGTON, TEXAS 76011

January 6, 1978

MEMORANDUM FOR: W. G. Hubacek
R. G. Taylor
R. C. Stewart
C. R. Oberg

FROM: W. A. Crossman, Chief, Projects Section

SUBJECT: TREND ANALYSIS - 1977

Please perform a trend analysis of the performance of each of your assigned "active" licensees for the calendar year 1977. In cases where responsibility for licensees is being reassigned, the inspector who was responsible for the licensee in calendar year 1977 will prepare the analysis. Your analysis should include the following information:

a. Number and Repetiveness of Construction Deficiency Reports

b. Enforcement History

For each facility list:

(1) Inspection Report Number
(2) Dates of Inspection
(3) Number of Violations
(4) Number of Infractions
(5) Number of Deficiencies
(6) Number of Deviations
(7) Mandays involved (for that inspection)
(8) Remarks (indicate if repeat from 1977 and 1976)
(9) Number of unresolved items

c. Responsiveness of Licensee to Enforcement Action

(1) Is licensee on time with answer to our letter?
(2) Are answers adequate? Do we have to go back for more information?
(3) Are any inadequate answers our fault?
(4) Is corrective action done promptly?
(5) Is the licensee responsive?

d. Unresolved Items

(1) Are unresolved items cleared rapidly?
(2) Are numbers/inspection on the increase? Why?
(3) Number of unresolved items escalated to enforcement items.

e. Corporate Management Involvement in Regulation Matters

(1) Sufficient management representation at exit interviews?
(2) Attitude receptive?
(3) Signature on licensee letters appropriate level?
(4) Is management involved? (Indicate basis for answer)

f. Effectiveness of QA/QC Program

This is a very subjective matter. I desire your own opinion and basis for your opinion. If too early in construction phase to state, indicate this. Also indicate what you believe we can do to have them improve their program. This information should not be included in the documented analysis, but you should be prepared to discuss it with Mr. Seidle.

g. Any Other Trends Indicative of Poor Performance

List and discuss any other indications that may point out poor/good performance.

Please have your information to me by COB on January 31, 1978.

W. A. Crossman, Chief
Projects Section

cc: W. C. Seidle

MEMORANDUM FOR: W. A. Crossman, Chief, Projects Section

FROM: R. G. Taylor, Reactor Inspector, Projects Section

Subject: TREND ANALYSIS - 1977
SOUTH TEXAS PROJECT, UNITS 1 & 2
DN 50-498 & 499

The following information is provided in response to your memorandum, same subject, dated January 6, 1977.

a. Number and Repetiveness of Construction Deficiency Reports

(1) Number = 1

(2) Repetiveness = 0

b. Enforcement History

Please see attached summary.

c. Responsiveness of Licensee to Enforcement Action

(1) Licensee has been on time with responses.

(2) Two of five responses were considered inadequate.

(3) I don't believe that we were at fault for the licensee's inadequacy.

(4) The licensee is very prompt with his corrective action.

(5) The licensee is responsive to our actions.

d. Unresolved Items

(1) Unresolved items are generally cleared very quickly.

(2) There is no particular trend apparent.

(3) None of the unresolved items have been escalated.

e. Corporate Management Involvement in Regulation Matters

(1) The licensee and his general contractor have been very adequately represented at exit meetings.

(2) The licensee management's attitude is very good.

(3) The licensee's executive vice president is signatary on letters to us.

(4) The licensee's management gives a picture of close involvement as based on discussions with subordinate personnel and review of notes attached to audit reports and letters reviewed during inspections.

f. Effectiveness of QA/QC Program

The licensee appears to be well motivated. Such problems as there are have been discussed with you and Mr. Seidle.

g. Other Trends Indicative of Poor Performance

None.

SOUTH TEXAS PROJECT, UNIT 1
D/N 50-498

Report	Dates	V	I	D	D	M/D	U	Remarks
77-01	1/03-06/77	0	0	0	0	7.875	1	
77-02	1/27-28/77	0	0	0	0	.375	0	Environmental Inspection
77-03	2/02-03/77	0	0	0	0	2.5	0	Investigation
77-04	2/15 & 3/1-4	0	1	0	0	6.875	1	
77-05	3/27-31/77	0	2	0	0	7.875	1	
77-06	4/26-29/77	0	0	1	1	4.75	1	
77-07	6/20-22/77	0	0	0	0	4.25	1	
77-08	7/06-08/77	0	0	0	0	3.5	0	Investigation
77-09	9/27-30/77	0	0	0	0	6.375	0	
77-10	10/25-28/77	0	0	0	0	2.625	1	
77-11	11/08-11/77	0	0	0	0	6.5	1	
77-12	11/29-12/1/77	0	0	1	1	1.5	0	
77-13	12/19-21/77	0	0	0	0	2.0	0	
77-14	12/15-16/77	0	0	0	0	1.5	0	Investigation
TOTALS		0	3	2	2	58.5	7	

SOUTH TEXAS PROJECT, UNIT 2
D/N 50-499

Report	Dates	Enforcement V	I	D	D	M/D	U	Remarks
77-01	1/03-06/77	0	0	0	0	.125	0	
77-02	1/27-28/77	0	0	0	0	.375	0	Environmental Inspection
77-03	1/26-29/77	0	0	1	0	1.25	0	
77-04	9/27-30/77	0	1	0	0	2.875	0	
77-05	10/25-28/77	0	0	0	0	.25	1	
77-06	11/08-11/77	0	0	0	0	3.0	0	
77-07	11/29-12/1/77	0	0	1*	1*	1.375	0	*shared with Unit 1
77-08	12/19-21/77	0	0	0	0	3.125	0	
77-09	12/15-16/77	0	0	0	0	1.5	0	Investigation
TOTALS		0	1	2	1	13.875	1	

~~[illegible]~~ BILL SEIDLE, ~~STEWART~~ KLC

Per our discussion, this AM, this is to confirm that a final analysis, similar to that which was conducted last year, will be conducted by the Project inspectors during the first quarter of 1979.

W. C. Seidle

a. 1-79

YES, STEWART HAS ASSIGNMENT. HE HAS A LETTER IN TRAINS FOR THE PS INSPECTORS INPUT

BILL C.

NOS 6/29/82
TB

February 2, 1979

MEMORANDUM FOR: W. G. Hubacek
R. C. Stewart
R. G. Taylor
C. R. Oberg

FROM: W. A. Crossman, Chief, Projects Section

SUBJECT: TREND ANALYSIS - 1978

Please perform a trend analysis of the performance of each of your assigned "active" licensees for the calendar year 1978. In cases where responsibility for licensees is being reassigned, the inspector who was responsible for the licensee in calendar year 1978 will prepare the analysis. Your analysis should include the following information:

a. Number and Repetiveness of Construction Deficiency Reports

b. Enforcement History

For each facility list:

(1) Inspection Report Number
(2) Dates of Inspection
(3) Number of Violations
(4) Number of Infractions
(5) Number of Deficiencies
(6) Number of Deviations
(7) Mandays Involved (for that inspection)
(8) Remarks (indicate if repeat from 1978 and 1977)
(9) Number of unresolved items

c. Responsiveness of Licensee to Enforcement Action

(1) Is licensee on time with answer to our letter?
(2) Are answers adequate? Do we have to go back for more information?
(3) Are any inadequate answers our fault?
(4) Is corrective action done promptly?
(5) Is the licensee responsive?

POS 6/29/82 TB

RIV

WCrossman/nh

2/27/79

c. Unresolved Items

(1) Are unresolved items cleared rapidly?
(2) Are numbers/inspection on the increase? Why?
(3) Number of unresolved items escalated to enforcement items.

e. Corporate Management Involvement in Regulation Matters

(1) Sufficient management representation at exit interviews?
(2) Attitude receptive?
(3) Signature on licensee letters appropriate level?
(4) Is management involved? (Indicate basis for answer)

f. Effectiveness of QA/QC Program

This is a very subjective matter. I desire your own opinion and basis for your opinion. If too early in construction phase to state, indicate this. Also indicate what you believe we can do to have them improve their program. This information should not be included in the documented analysis, but you should be prepared to discuss it with Mr. Seidle.

g. Any Other Trends Indicative of Poor Performance

List and discuss any other indications that may point out poor/good performance.

Please have your information to me by COB on February 28, 1979.

Original Signed
by W. A. Crossman

W. A. Crossman, Chief
Projects Section

cc: M. C. Seidle

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

October 19, 1979

MEMORANDUM FOR: W. A. Crossman, Chief, Projects Section

FROM: R. C. Stewart, Reactor Inspector, Projects Section

SUBJECT: TREND ANALYSIS - 1978

The attached information is provided you in response to your memorandum, same subject, dated February 2, 1979. The information, prepared by each of the assigned project inspectors, include only those facilities that were in an active construction status during CY 1978.

R. C. Stewart

R. C. Stewart, Reactor Inspector
Projects Section

NOS 6/29/82

South Texas Project
Units 1 & 2, DN 50-498; 50-499
TREND ANALYSIS - 1978

a. Number and Repetitiveness of Construction Deficiency Reports

Seven items were reported as potential construction deficiencies of which four were determined to be reportable in the context of 50.55(e). Two of the items (voids in Lift 15 of Unit 1 containment and voids in the slab under Unit 2 spent fuel pool) were repetitive.

b. Enforcement History

(See attached sheet)

c. Responsiveness of Licensee to Enforcement Action

(1) The licensee was timely in all responses except to our letter of November 15, 1978, which transmitted report No. 78-16. The response to this letter was dated January 8, 1978. This late response was apparently due to simultaneous reassignment of the Project QA Supervisor and the Site QA Supervisor at that time which caused a temporary discontinuity in their tracking system.

(2) Answers were generally adequate except the initial response to report No. 78-16. Items failed to adequately address corrective actions to preclude recurrence. A subsequent response, which we requested, was adequate.

(3) Inadequate answers were not our fault. The licensee attributed the inadequacy of their response to report No. 78-16 to undue haste in preparation after being informed by our office that their response was overdue.

(4) Corrective action was done promptly.

(5) The licensee has been responsive.

d. Unresolved Items

(1) Unresolved items were cleared in a timely manner.

(2) The number of unresolved items per inspection has increased. This increase may be attributed in part to increased construction activity at STP and to the focusing of our attention on certain areas because of recent allegations. Another factor is the recent change (June 1978) of the site quality procedures which has caused some confusion in implementation and documentation.

(3) None of the unresolved items were escalated to enforcement items.

e. Corporate Management in Regulation Matters

(1) There was sufficient management representation at exit interviews.

(2) Management's attitude was receptive.

(3) Signature on licensee letters was of appropriate level.

(4) Management appears to be involved in QA matters. Their involvement appears to have intensified since our management meetings which took place following our investigations of allegations. Their increased involvement is evidenced by their recent reorganization of the STP project team by which HL&P has become much more active in construction and QA activities. In addition, HL&P management has been frequently observed at the STP site during our inspections.

f. Effectiveness of QA/QC Program

(oral presentation)

g. Any Other Trends Indicative of Poor Performance

Frequent allegations of questionable QA/QC practices.

South Texas Project
Units 1 & 2, DN 50-498; 50-499

ENFORCEMENT HISTORY

Report No.	Dates	V	I	D	D	U	M/D	Remarks
78-01	1/10-13	0	2	0	0	0	6-3/8	
78-02	1/25-27	0	0	0	0	2	2	Environmental
78-03	2/21-24	0	0	0	0	2	9-3/4	
78-04	3/21-23	0	1	0	0	0	10	Infraction not cited
78-05	3/21	0	0	0	0	0	-3/4	Investigation
78-06	4/04-07	0	0	0	0	0	3-1/2	
78-07	4/17-20	0	2	0	0	1	9	
78-08	5/16-19	0	0	0	0	0	3	
78-09	5/16-19	0	0	0	0	0	6	Investigation
78-10	5/30-6/2	0	0	0	0	2	7	
78-11	6/11-14	0	0	0	0	0	9	
78-12	6/25-28	0	0	0	0	0	9	Investigation
78-13	8/15	0	0	0	0	0	-	Meeting
78-14	8/22-25	0	0	0	0	0	6-7/8	Investigation
78-15	9/11/14	0	2	0	0	3	6-1/2	Investigation
78-16	10/24-27	0	3	0	0	1	9	
78-17	12/05-08	0	0	0	1	0	6	
78-18	12/19-22	0	0	0	0	1	6	

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

January 4, 1980

MEMORANDUM FOR: W. A. Crossman, Chief, Projects Section

FROM: W. C. Seidle, Chief, RC&ES Branch

SUBJECT: TREND ANALYSIS - 1979

Please request your project inspectors to conduct a trend analysis of the performance of each of their assigned facilities during calendar year 1979. The analysis should be consistent with the considerations identified in my memorandum to you dated January 4, 1977 (copy attached).

Please provide me with the analyses by COB February 15, 1980.

W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch

cc: K. V. Seyfrit
R. E. Hall
W. E. Vetter

8204280389

REGION IV
ARLINGTON TEXAS 76011

January 17, 1980

MEMORANDUM FOR: W. G. Hubacek
R. C. Stewart
R. G. Taylor
C. R. Oberg
E. S. Phillips

FROM: W. A. Crossman, Chief, Projects Section

SUBJECT: TREND ANALYSIS - 1979

Please perform a trend analysis of the performance of each of your assigned "active" licensees for the calendar year 1979. Your analysis should include the following information:

a. Number and Repetitiveness of Construction Deficiency Reports

b. Enforcement History

For each facility list:

(1) Inspection Report Number
(2) Dates of Inspection
(3) Number of Violations
(4) Number of Infractions
(5) Number of Deficiencies
(6) Number of Deviations
(7) Mandays involved (for that inspection)
(8) Remarks (indicate if repeat from 1978 and 1979)
(9) Number of unresolved items

c. Responsiveness of Licensee to Enforcement Action

(1) Is licensee on time with answer to our letter?
(2) Are answers adequate? Do we have to go back for more information?
(3) Are any inadequate answers our fault?
(4) Is corrective action done promptly?
(5) Is the licensee responsive?

d. Unresolved Items

(1) Are unresolved items cleared rapidly?
(2) Are numbers/inspection on the increase? Why?
(3) Number of unresolved items escalated to enforcement items.

e. Corporate Management Involvement in Regulation Matters

(1) Sufficient management representation at exit interviews?
(2) Attitude receptive?
(3) Signature on licensee letters appropriate level?
(4) Is management involved? (Indicate basis for answer)

f. Effectiveness of QA/QC Program

This is a very subjective matter. I desire your own opinion and basis for your opinion. If too early in construction phase to state, indicate this. Also indicate what you believe we can do to have them improve their program. This information should not be included in the documented analysis, but you should be prepared to discuss it with Mr. Seidle.

g. Any Other Trends Indicative of Poor Performance

List and discuss any other indications that may point out poor/good performance.

Please have your information to me by COB on February 15, 1980.

for W. A. Crossman, Chief
Projects Section

cc: W. C. Seidle

March 3, 1980

MEMORANDUM FOR: W. A. Crossman, Chief, Projects Section

FROM: W. G. Hubacek, Reactor Inspector, Projects Section

SUBJECT: TREND ANALYSIS - 1979

The attached information is provided in response to your memorandum, same subject, dated January 17, 1980. The information, prepared by the assigned project inspectors, includes only those facilities that were in an active construction status during calendar year 1979.

W. G. Hubacek, Reactor Inspector
Projects Section

cc: Project Inspectors

NUREG-0834
Final Report

NRC Licensee Assessments

Manuscript Completed: August 1981
Date Published: August 1981

Systematic Assessment of Licensee Performance Review Group (SALP)

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

COMMISSION STATEMENT

The Commission endorses the staff's factual findings in this report concerning individual licensee operations. The Commission also encourages licensees to make improvements in the areas of weakness identified by the staff. However, in view of the long time span during which individual plant evaluations were made, the Commission does not believe that the relative rankings necessarily represent current conditions. The Commission has prepared guidance for the staff to govern the conduct of future assessments.

In the area of quality assurance there were numerous items of noncompliance, instances of unqualified QC inspectors, and instances of inadequate control of contractor activities. Earlier quality assurance problems associated with materials and placement of soils and backfills were identified during the evaluation period. The licensee was slow in responding to NRC concerns regarding soil placement. An NRC Order modifying the construction permit was issued to assure corrective action to the soil problems. Major deficiencies were identified in quality assurance controls over the installation of safety-related heating, ventilating, and air-conditioning components. These deficiencies resulted in the issuance of an NRC stop work order and the imposition of civil penalties to assure corrective action. Technical responses to NRR were occasionally inadequate but have shown improvement during the evaluation period.

Midland received a relatively large number of items of noncompliance when compared with other power reactor facilities under construction. During the evaluation the licensee initiated action that allowed a reorganization to be implemented in August 1980.

South Texas Project 1 & 2 Evaluation Period: 8/1/79 - 7/31/80

The South Texas Project facility displayed evidence of management weaknesses in the areas of quality assurance and overall construction management. A Regional SALP Board review and licensee meeting was not held as part of the South Texas Project evaluation. The Review Group examined investigation and inspection reports, and other data relevant to the evaluation period, in rating the South Texas Project facility.

The licensee had not sufficiently implemented quality assurance and management controls. Personnel training regarding quality assurance was inadequate. Construction pressures thwarted quality control functions. There were threats, harassment, and intimidation of quality control inspectors, and the licensee (who was knowledgeable of these problems) failed to take effective corrective

action. There were numerous instances of failure to follow procedures in the areas of document control, material storage, concrete placement, and welding. Audit and surveillance programs were improperly implemented.

The licensee had a breakdown in the implementation of the quality assurance program and management controls for safety-related concrete pours and safety-related welding. Extensive NRC investigation of licensee activities resulted in numerous items of noncompliance, escalated enforcement, frequent management contacts, and an NRC Show Cause Order to assure compliance with NRC requirements. Incremental resumption of safety-related concrete placement and welding has been subject to the approval of the NRC.

Washington Nuclear Project No. 2 Evaluation Period: 4/1/79 - 4/1/80

The Washington Nuclear Project No. 2 (WNP-2) facility displayed evidence of weaknesses in six functional areas. These areas were quality assurance (including management and training), safety-related structures, piping and hangers, electrical equipment, electrical (tray and wire), and instrumentation.

The area of quality assurance was characterized by ineffective program implementation and inadequate control of contractor activities. There were numerous items of noncompliance involving procedure and drawing adherence, control of special processes, and maintenance of quality assurance records. The licensee had extensive difficulties in the installation of safety-related pipe whip restraints, and in the erection and welding of the sacrificial shield wall. The NRC required the licensee to stop work related to these two areas of construction and took escalated enforcement action.

WNP-2 received a large number of items of noncompliance when compared with other power reactor facilites under construction. Licensee submittals to NRR displayed technical weaknesses and the licensee was not responsive to NRC technical requests on various occasions. The licensee received extensive NRC action (including escalated enforcement, frequent management contacts, and stop-work orders) to assure compliance with NRC requirements.

A 1 MAY 1982

Dockets: 50-498/81-37
50-499/81-37

Houston Lighting and Power Company
ATTN: Mr. G. W. Oprea, Jr.
Executive Vice President
P. O. Box 1700
Houston, TX 77001

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of the South Texas Facility, Units 1 and 2, Construction Permit CPPR-128 and CPPR-129. The SALP Board met on September 11, 1981, to evaluate the performance of the subject facility for the period July 1, 1980, through June 30, 1981. The performance analyses and resulting evaluation are documented in the enclosed SALP Board Report. These analyses and evaluation were discussed with you at your office in Houston, Texas, on October 16, 1981.

The performance of your facility was evaluated in the following functional areas: Containment and other Safety-Related Structures; Support Systems; Licensing Activities; and Corrective Action and Reporting.

The SALP Board evaluation process consists of categorizing performance in each functional area. The categories which we have used to evaluate the performance of your facility are defined in Section II of the enclosed SALP Board Report. As you are aware, the NRC has changed the policy for the conduct of the SALP program based on our experiences and the recently implemented reorganization which emphasizes the regionalization of the NRC staff. This report is consistent with the revised policy.

Any comments which you may have concerning our evaluation of the performance of your facility should be submitted to this office within 20 days of the date of this letter. Your comments, if any, and the SALP Board Report, will both appear as enclosures to the Region IV Administrator's letter which issues the SALP Report as an NRC Report. In addition to the issuance of the report, this letter will, if appropriate, state the NRC position on matters relating to the status of your safety program.

Comments which you may submit at your option, are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

"Original Signed by"
G. L. Madsen

G. L. Madsen, Chief
Reactor Project Branch 1

Enclosure:
Appendix - NRC Report 50-498/81-37
50-499/81-37

NO DMB QUEST. AT THIS TIME

bcc to DMB (IE01)
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W. Hubacek
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APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Systematic Assessment of Licensee Performance

Report: 50-498/81-37
50-499/81-37

Dockets: 50-498 & 50-499 Category A2

Licensee: Houston Lighting and Power Company
P. O. Box 1700
Houton, Texas 77001

Facility Name: South Texas Project, Units 1 and 2

Appraisal Period: July 1, 1980-June 30, 1981

Appraisal Completion Date: September 1, 1981

Licensee Meeting: October 16, 1981

SALP Board: W. C. Seidle, Chief, Reactor Project Branch 2
W. A. Crossman, Chief, Reactor Project Section B
D. E. Sells, NRR Project Manager
H. S. Phillips, Senior Resident Inspector
W. G. Hubacek, STP Transition Coordinator
R. C. Stewart, Reactor Inspector
J. I. Tapia, Reactor Inspector

Reviewed by: W A Crossman 4/27/82
W. A. Crossman, Chief Date
Reactor Project Section B

Approved by: for W C Seidle 4/29/82
W. C. Seidle, Chief Date
Reactor Project Branch 2
(SALP Board Chairman)

I. Introduction

Systematic Assessment of Licensee Performance (SALP) is an integrated NRC staff effort to collect available observations and data annually and to evaluate licensee performance utilizing these data and observations as a basis. The integrated systematic assessment is intended to be sufficiently diagnostic to provide a rational basis for allocating NRC resources and to provide meaningful guidance to licensee management.

II. Criteria

The assessment of licensee performance is implemented through the use of seven evaluation criteria. These criteria are applied to each functional area that is applicable to the facility activities (construction, preoperation or operation) for the categorization of licensee performance in these areas.

One or more of the following evaluation criteria are used to assess each applicable functional area.

1. Management involvement in assuring quality

2. Approach to resolution of technical issues from safety standpoint

3. Responsiveness to NRC initiatives

4. Enforcement history

5. Reporting and analysis of reportable events

6. Staffing (including management)

7. Training effectiveness and qualification

Attributes associated with the above evaluation criteria form the guidance for the SALP Board for categorization of each functional area in one of three categories. Performance categories are defined as follows:

Category 1: A combination of attributes which demonstrates achievement of superior safety performance; i.e., licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved. Reduced NRC attention may be appropriate.

Category 2: A combination of attributes which demonstrates achievement of satisfactory safety performance; i.e., licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that

satisfactory performance with respect to operational safety or construction is being achieved. NRC attention should be maintained at normal levels.

Category 3: A combination of attributes which demonstrates achievement of only minimally satisfactory safety performance; i.e., licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved. Both NRC and licensee attention should be increased.

III. Summary of Results

Functional Areas		Category
1.	Soils and Foundations	NA
2.	Containment and other Safety-Related Structures	2
3.	Piping Systems and Supports	NA
4.	Safety-Related Components	NA
5.	Support Systems	2
6.	Electrical Power Supply and Distribution	NA
7.	Instrumentation and Control Systems	NA
8.	Licensing Activities	1
9.	Corrective Action and Reporting	3

IV. Performance Analyses

The SALP Board obtained assessment data applicable to the appraisal period of July 1, 1980, to June 30, 1981. The data for the South Texas Project (STP) was tabulated and analyzed and a performance analysis was developed for each of six functional areas.

The SALP Board met on October 16, 1981, to review the performance analyses and supporting data and to develop the SALP Board Report.

Functional Area Analysis

1. Soils and Foundations

All activities completed.

2. Containment and other Safety-Related Structures

Limited work has been done relative to containment concrete activities. However, two noncompliances were identified: (a) failure to maintain/inspect traceability of imbeds, and (b) failure to test for air content of grout. Limited work effort observed since the licensee lifted a self-imposed stop work order appeared to be satisfactorily performed.

One noncompliance was identified in the area of other safety-related structures: failure to assure that purchased material (inspection of Nelson stud welding to embeds) conformed to procurement documents. This welding was performed and inspected initially by Bostrom Bergen and was again inspected by Brown & Root (B&R) vendor inspectors. This item and several 50.55(e) reports have indicated a weakness in the B&R vendor surveillance program. Proper corrective action has been taken to correct this programmatic weakness.

The Board considered management control in this functional area to be of a Category 2 level.

3. Piping Systems and Supports

Region IV has performed very little inspection in this area for two reasons: (a) NRC efforts have been concentrated on QA programmatic areas, and (b) the volume of work activity has been low. In recent months, work has stopped in this area to allow design engineering to catch up.

The Board did not make an assessment in this functional area.

4. Safety-Related Components, Including Vessels, Internals and Pumps

Work activities in this area have been very low relative to setting equipment because: (a) status of construction, and (b) sandblast activities inside Unit 1 Containment and Auxiliary Buildings.

One nonconformance was identified as a generic problem in IE Report 50-498/81-01; 50-499/81-01: failure to follow procedure for storage and maintenance of equipment. Corrective action to date appears to be adequate but final follow-up inspection has not been completed.

Due to limited work, the Board did not assess this area.

5. Support Systems Including HVAC, Radwaste and Fire Protection

There was limited work in the areas of radwaste and fire protection during the assessment period. No problems were identified in these areas during this time.

On May 8, 1981, HL&P notified Region IV in accordance with 10 CFR 50.55(e) of a construction deficiency concerning the consideration of certain faulted condition heat loads in the design of portions of the HVAC system (see item V, 1, b, (10)). A determination was made, based on an assessment of preliminary thermal environmental data, that certain spaces and cubicles within the MEAB and FHB would require additional HVAC capacity. However, work relating to this item was halted due to changeover of A/Es for STP.

The Board assessed performance in this functional area as Category 2.

6. Electrical Power Supply and Distribution

No work activity has occurred in this area; however, the storage and maintenance has been inspected and appears to be generally satisfactory.

No assessment was made in this area.

7. Instrumentation and Control Systems

See item 6, above.

8. Licensing Activities

Licensee activities dealing with licensing requirements have improved significantly during the reporting period. Responses to requests for information have been timely and of good quality during the reporting period. Licensee understanding of NRC requirements is adequate.

The Board assessed the licensee's performance in this functional area to be Category 1.

9. Corrective Actions and Reporting

The constructor (B&R) continues to experience difficulty relative to corrective action. It also appears that the root cause of the problem associated with NRC and licensee identified deficiencies is that the deficiencies are not effectively corrected and are not corrected in a timely manner.

Some improvement has been noted, but the constructor has not been able to properly address the issue because of the extreme demands placed on all licensee and contractor organizations by the NRC Show Cause. Response effort to the NRC Show Cause has resulted in extensive reexamination/repair programs, special technical and QA reviews, organizational restructuring, numerous personnel changes, and rapid turnover of personnel including key management positions. In all fairness, the performance of the constructor site organization should be evaluated during more normal conditions.

Senior licensee and constructor management must continue to be intimately involved with the corrective action process to assure that this area is improved.

Licensee reporting of construction deficiencies in accordance with 10 CFR 50.55(e) requirements has been satisfactory in all respects.

The Board assessed licensee performance in this functional area to be Category 3.

10. Conclusion

The Board based their overall assessment on review of the QA program corrective action and on observing limited work activity caused by the IE Investigation Report 50-498/79-19; 50-499/79-19, Show Cause and Stop Work Orders imposed on Brown & Root, Inc., the prime contractor, by the licensee. The rating was most heavily influenced by B&R's continued inability to correct the root causes of problems and take corrective action in a timely manner. The QA program's success is largely dependent upon the correction of the cause of deficiencies.

Although Houston Lighting and Power Company (HL&P) has taken affirmative steps and actions in the area described above, the implementation of corrective action measures and procedures is still considered a weak area. Therefore, the overall rating for licensee performance is determined to be Category 3, because of HL&P's inability to compel a significant improvement in B&R's performance in this area.

11. Board's Recommendations

The Board recommended augmented inspection of the South Texas Project through the transition phase of construction and into restart of construction until performance demonstrates that normal inspection activities may be resumed.

V. Supporting Data and Summaries

1. Reports Data

a. LER Numbers Reviewed (not applicable)

b. Construction Deficiency Reports

The licensee's system for reporting construction deficiencies is located in the Houston offices. Deficiencies identified onsite are forwarded to the Incident Review Committee (IRC) for evaluation. IE Inspection Report 50-498/81-07; 50-499/81-07 documented a review of this system which included: (1) reviewing licensee written reports for 1980, and (2) reviewing 58 IRC evaluations from April 26, 1977, to July 3, 1980.

Eleven reports from July 1, 1980, to June 30, 1981, were reviewed and evaluated. These deficiencies are described below:

(1) Design of Auxiliary Feedwater Pump (All environmental factors not considered in design.)

(2) Breakdown in QA Program Relative to Application of Paint to Steel and Concrete Surfaces Except for Liner Plate

(3) Reactor Containment Building Structural Steel Beams Loading

(4) Unacceptable Surface Condition of Weld in Main Steam Piping and Secondary Shield Wall Whip Restraints

(5) Cooling of Primary Shield Wall Penetration Insufficient Air Flow Between Reactor Coolant Nozzle and Seal Plate

(6) Inadequate Cable Tray Hanger Design

(7) Hilti Anchor Bolts Design Strength Inadequate

(8) American Bridge Structural Steel Welds Deficiencies

(9) Non-Approved Hilti Revised QA Manual

(10) Faulted Condition Heat Loads in Design of Portions of the HVAC System

(11) Computer Program Verification

A trend was noted relative to the deficiencies reported; that is, 7 of 11 were design problems. As a result of this trend and other information, a special NRC inspection of the

design engineering organization was requested on May 27, 1981. That inspection and review is still in progress and final results are not available.

c. Part 21 Reports

The licensee reported two 50.55(e) construction deficiencies as a result of two Part 21 reports which were reported to the licensee. These items are as follows:

(1) CONSIP Pump Shaft Failure

(2) Steam Generator Water Level Measurement System Error

2. Licensee Activities

The licensee's construction activities have been low during the subject period because of the NRC Show Cause Order and Stop Work Orders imposed by the licensee.

3. Inspection Activities

A special team was assigned to follow up on the IE Investigation 79-19 and the Show Cause Order. This effort continued during the entire reporting period and involved approximately 1318 inspector-hours. An insignificant number of inspector-hours was devoted to the routine inspection program because of follow-up and reactive inspection.

4. Investigation and Allegations Review

Twelve investigations were conducted during the subject period which involved 756 inspector-hours. These investigations are summarized below:

	Subject	Results
a.	Three allegations relative to (1) painting records, (2) weld rod oven power loss, (3) RCB-2 settlement.	Allegations were not confirmed.
b.	Seven allegations relative to (1) improper specification revision; (2) improper application of coatings, (3) design engineers not	Specification, improper coating; improper coating records at contractor were confirmed. Remainder were not confirmed.

	Subject	Results
	qualified, (4) QC coating records falsified, (5) coating records not authentic, (6) American Bridge coating records incomplete, (7) improper coating repair.	
c.	Two allegations relative to (1) B&R foreman intimidating employees, (2) B&R management took no action on electrical department problems.	The first allegation was confirmed; however, morale and personnel problems were turned over to HL&P management.
d.	One allegation relative to site personnel knowing that an NRC investigation was to occur.	Allegation confirmed.
e.	Eleven allegations relative to (1) B&R intimidation of employees, (2) inadequate inspection of materials leaving warehouse, (3) electrical personnel not qualified, (4) concrete form shifted, (5) HL&P/B&R forewarned of NRC inspection, (6) FREA procedure improper, (7) B&R performing work that should not have been performed, (8) low morale, (9) termination shack calibration practices improper, (10) B&R did not advise employees of results of employee survey, (11) procurement of electrical supplies improper.	All allegations confirmed except unqualified personnel and concrete form shift.
f.	One allegation relative to pipe sleeve weld defects.	Allegation not confirmed.
g.	Four allegations relative to (1) electrical shop records/ calibration, (2) storage of safety-related piping in lay down area "M", (3) storage of	Allegation (4) was confirmed but item was not safety-related.

	Subject	Results
	safety-related piping in fab shop area, (4) B&R piping isometric drawings differ from specification sheets.	
h.	Three allegations relative to (1) B&R foreman fired because he resisted production pressures, (2) B&R rehired personnel formerly fired because of conditions identified in IE Report 79-19, (3) Cadweld records inadequate and falsified.	Allegation (2) was confirmed and (3) had "some merit."
i.	One allegation relative to drug use at STP must affect quality of construction.	Allegation was not confirmed.
j.	Five allegations relative to (1) construction deficiencies not properly reported, (2) clearly promoted to project quality engineer not qualified, (3) B&R auditor at STP not qualified, (4) management intimidated an employee, (5) B&R engineer's experience inadequate for position to which he was to be promoted.	Allegations were not confirmed.
k.	Four allegations relative to (1) designers of STP piping systems are not competent, (2) supervisors signing/ approving drawings not competent, (3) Nuclear Power Service, Inc., is worst contractor onsite, (4) B&R stress analysis of piping system questioned.	Allegations (1) and (2) were not confirmed, while (3) was turned over to Region IV Vendor Inspection Branch.
l.	Two allegations relative to (1) permanent plant equipment not inspected and records falsified to show inspection results, (2) millwright foreman not qualified.	Allegations were confirmed.

5. Escalated Enforcement Actions

a. Civil Penalties, and

b. Orders

The NRC imposed a $100,000 civil penalty and issued a Show Cause Order to the licensee on April 30, 1980. The licensee paid the civil penalty and provided a complex and detailed response on July 28, 1980. In accordance with the Order, on August 19, 1980, a public meeting was held between NRC and licensee senior management to discuss the subject response. Senior representatives from B&R also attended. These proceedings were documented and placed in the Public Document Room.

As a result of this meeting, HL&P summarized all commitments made in the written response, commitments made between NRC and licensee management, and commitments made at the public meeting in HL&P letter (ST-HL-AE 533) dated September 18, 1980.

Parties to intervene requested that all construction work be stopped but this request was denied. However, the Commission did decide to have accelerated hearings on the QA portion for the operating license to determine the licensee management's character and competence. These hearings started on May 12, 1981, in Bay City, Texas, and are expected to extend into late fall 1981.

c. Immediate Action Letters

Nine immediate action letters were issued relative to confirming stop work actions imposed by the licensee. The following is a summary.

(1) Issued July 17, 1980, confirming licensee self-imposed Stop Work Order to check adequacy of controls for AWS welder qualifications and requalifications.

(2) Issued October 3, 1980, confirming licensee's commitments regarding re-examination, repair, and restart of AWS welding.

(3) Issued October 22, 1980, confirming licensee's commitments for additional AWS safety-related welding.

(4) Issued November 21, 1980, confirming licensee's commitments regarding initiating ASME welding activities.

(5) Issued January 5, 1981, confirming licensee's commitments regarding the ASME safety-related welding 10-Week Work Plan and resumption of safety-related AWS welding.

(6) Issued January 13, 1981, confirming licensee's commitments regarding initiating complex concrete work activities.

(7) Issued February 19, 1981, concerning substitution of certain ASME welding identified in the ASME safety-related welding 10-Week Work Plan.

(8) Issued March 31, 1981, confirming licensee's commitments regarding further limited ASME safety-related welding as outlined in licensee's 12-Week Work Plan.

(9) Issued April 16, 1981, confirming licensee's commitments regarding expanding complex concrete work activities.

6. Management Conferences Held During Appraisal Period

The following were management meetings held during the SALP reporting period:

a. At the request of the licensee, a management meeting was held on June 17, 1980, to discuss actions being developed regarding Show Cause Order items.

b. At the request of the licensee, a management meeting was held to discuss actions being taken regarding Show Cause Order items related to Special Investigation 79-19.

c. November 18, 1980, to discuss status of outstanding Show Cause Order items and restart of work.

d. March 23, 1981, to discuss restart to ASME welding and current status of Show Cause Order commitments.

JUN 2 8 1982

Charles Bechhoefer, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James C. Lamb III
Administrative Judge
313 Woodhaven Road
Chapel Hill, NC 27514

Mr. Ernest E. Hill
Administrative Judge
Lawrence Livermore Laboratory
University of California
P.O. Box 808, L-46
Livermore, CA 94550

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In the Matter of
Houston Lighting and Power Company
(South Texas Project, Units 1 & 2)
Docket Nos. 50-498 and 50-499

Dear Administrative Judges:

Enclosed for your information is the Systematic Assessment of Licensee Performance (SALP) Board Report for the South Texas Project. This report was released on June 18, 1982.

Sincerely,

Jay M. Gutierrez
Counsel for NRC Staff

Enclosure: As Stated

cc: (w/enclosure)
Melbert Schwarz, Jr., Esq.
Brian Berwick, Esq.
Mrs. Peggy Buchorn
Kim Eastman
Pat Coy
Atomic Safety and Licensing Board Panel
Docketing and Service Section
William S. Jordan, III, Esq.
Jack R. Newman, Esq.
Mr. Lanny Sinkin
Barbara A. Miller
Mr. David Prestemon
Atomic Safety and Licensing Appeal Board Panel

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DATE	:06/28/82	:06/28/82	:	:	:

JUN 18 1982

Dockets: 50-498/81-37
50-499/81-37

Houston Lighting and Power Company
ATTN: Mr. G. W. Oprea, Jr.
Executive Vice President
P. O. Box 1700
Houston, TX 77001

Gentlemen:

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The performance of your facility was evaluated in the selected functional areas: Containment and other Safety-Related Structures; Support Systems; Licensing Activities; and Corrective Action and Reporting.

The SALP Board evaluation process consists of categorizing performance in each functional area. The categories which we have used to evaluate the performance of your facility are defined in Section II of the enclosed SALP Board Report. As you are aware, the NRC has changed the policy for the conduct of the SALP program based on our experiences and the recently implemented reorganization which emphasizes the regionalization of the NRC staff. This report is consistent with of the revised policy.

On May 11, 1982, you were requested to provide comments concerning our evaluation of your facility. In that 20 days have passed, and no comments have been received, the SALP Board Report is being issued as an NRC Report.

NRS 6/29/82

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

"Original Signed by
R. L. COLLINS"

John T. Collins
Regional Administrator

Enclosure:
Appendix - NRC Report 50-498/81-37
50-499/81-37

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11 MAY 1982

Dockets: 50-498/81-37
50-499/81-37

Houston Lighting and Power Company
ATTN: Mr. G. W. Oprea, Jr.
Executive Vice President
P. O. Box 1700
Houston, TX 77001

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6/29/82

Comments which you may submit at your option, are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

"Original Signed by:
G. L. MADSEN"

G. L. Madsen, Chief
Reactor Project Branch 1

Enclosure:
Appendix - NRC Report 50-498/81-37
50-499/81-37

NO DMB DIST. AT THIS TIME

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APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Systematic Assessment of Licensee Performance

Report: 50-498/81-37
50-499/81-37

Dockets: 50-498 & 50-499 Category A2

Licensee: Houston Lighting and Power Company
P. O. Box 1700
Houton, Texas 77001

Facility Name: South Texas Project, Units 1 and 2

Appraisal Period: July 1, 1980-June 30, 1981

Appraisal Completion Date: September 1, 1981

Licensee Meeting: October 16, 1981

SALP Board: W. C. Seidle, Chief, Reactor Project Branch 2
W. A. Crossman, Chief, Reactor Project Section B
D. E. Sells, NRR Project Manager
H. S. Phillips, Senior Resident Inspector
W. G. Hubacek, STP Transition Coordinator
R. C. Stewart, Reactor Inspector
J. I. Tapia, Reactor Inspector

Reviewed by: W A Crossman 4/27/82
W. A. Crossman, Chief Date
Reactor Project Section B

Approved by: for D M Hunnicutt 4/29/82
W. C. Seidle, Chief Date
Reactor Project Branch 2
(SALP Board Chairman)

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2. Approach to resolution of technical issues from safety standpoint

3. Responsiveness to NRC initiatives

4. Enforcement history

5. Reporting and analysis of reportable events

6. Staffing (including management)

7. Training effectiveness and qualification

Attributes associated with the above evaluation criteria form the guidance for the SALP Board for categorization of each functional area in one of three categories. Performance categories are defined as follows:

Category 1: A combination of attributes which demonstrates achievement of superior safety performance; i.e., licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved. Reduced NRC attention may be appropriate.

Category 2: A combination of attributes which demonstrates achievement of satisfactory safety performance; i.e., licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that

satisfactory performance with respect to operational safety or construction is being achieved. NRC attention should be maintained at normal levels.

Category 3: A combination of attributes which demonstrates achievement of only minimally satisfactory safety performance; i.e., licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved. Both NRC and licensee attention should be increased.

III. Summary of Results

Functional Areas		Category
1.	Soils and Foundations	NA
2.	Containment and other Safety-Related Structures	2
3.	Piping Systems and Supports	NA
4.	Safety-Related Components	NA
5.	Support Systems	2
6.	Electrical Power Supply and Distribution	NA
7.	Instrumentation and Control Systems	NA
8.	Licensing Activities	1
9.	Corrective Action and Reporting	3

IV. Performance Analyses

The SALP Board obtained assessment data applicable to the appraisal period of July 1, 1980, to June 30, 1981. The data for the South Texas Project (STP) was tabulated and analyzed and a performance analysis was developed for each of six functional areas.

The SALP Board met on October 16, 1981, to review the performance analyses and supporting data and to develop the SALP Board Report.

Functional Area Analysis

1. Soils and Foundations

All activities completed.

2. Containment and other Safety-Related Structures

Limited work has been done relative to containment concrete activities. However, two noncompliances were identified: (a) failure to maintain/inspect traceability of imbeds, and (b) failure to test for air content of grout. Limited work effort observed since the licensee lifted a self-imposed stop work order appeared to be satisfactorily performed.

One noncompliance was identified in the area of other safety-related structures: failure to assure that purchased material (inspection of Nelson stud welding to embeds) conformed to procurement documents. This welding was performed and inspected initially by Bostrom Bergen and was again inspected by Brown & Root (B&R) vendor inspectors. This item and several 50.55(e) reports have indicated a weakness in the B&R vendor surveillance program. Proper corrective action has been taken to correct this programmatic weakness.

The Board considered management control in this functional area to be of a Category 2 level.

3. Piping Systems and Supports

Region IV has performed very little inspection in this area for two reasons: (a) NRC efforts have been concentrated on QA programmatic areas, and (b) the volume of work activity has been low. In recent months, work has stopped in this area to allow design engineering to catch up.

The Board did not make an assessment in this functional area.

4. Safety-Related Components, Including Vessels, Internals and Pumps

Work activities in this area have been very low relative to setting equipment because: (a) status of construction, and (b) sandblast activities inside Unit 1 Containment and Auxiliary Buildings.

One nonconformance was identified as a generic problem in IE Report 50-498/81-01; 50-499/81-01: failure to follow procedure for storage and maintenance of equipment. Corrective action to date appears to be adequate but final follow-up inspection has not been completed.

Due to limited work, the Board did not assess this area.

5. Support Systems Including HVAC, Radwaste and Fire Protection

There was limited work in the areas of radwaste and fire protection during the assessment period. No problems were identified in these areas during this time.

On May 8, 1981, HL&P notified Region IV in accordance with 10 CFR 50.55(e) of a construction deficiency concerning the consideration of certain faulted condition heat loads in the design of portions of the HVAC system (see item V, 1, b, (10)). A determination was made, based on an assessment of preliminary thermal environmental data, that certain spaces and cubicles within the MEAB and FHB would require additional HVAC capacity. However, work relating to this item was halted due to changeover of A/Es for STP.

The Board assessed performance in this functional area as Category 2.

6. Electrical Power Supply and Distribution

No work activity has occurred in this area; however, the storage and maintenance has been inspected and appears to be generally satisfactory.

No assessment was made in this area.

7. Instrumentation and Control Systems

See item 6, above.

8. Licensing Activities

Licensee activities dealing with licensing requirements have improved significantly during the reporting period. Responses to requests for information have been timely and of good quality during the reporting period. Licensee understanding of NRC requirements is adequate.

The Board assessed the licensee's performance in this functional area to be Category 1.

9. Corrective Actions and Reporting

The constructor (B&R) continues to experience difficulty relative to corrective action. It also appears that the root cause of the problem associated with NRC and licensee identified deficiencies is that the deficiencies are not effectively corrected and are not corrected in a timely manner.

Some improvement has been noted, but the constructor has not been able to properly address the issue because of the extreme demands placed on all licensee and contractor organizations by the NRC Show Cause. Response effort to the NRC Show Cause has resulted in extensive reexamination/repair programs, special technical and QA reviews, organizational restructuring, numerous personnel changes, and rapid turnover of personnel including key management positions. In all fairness, the performance of the constructor site organization should be evaluated during more normal conditions.

Senior licensee and constructor management must continue to be intimately involved with the corrective action process to assure that this area is improved.

Licensee reporting of construction deficiencies in accordance with 10 CFR 50.55(e) requirements has been satisfactory in all respects.

The Board assessed licensee performance in this functional area to be Category 3.

10. Conclusion

The Board based their overall assessment on review of the QA program corrective action and on observing limited work activity caused by the IE Investigation Report 50-498/79-19; 50-499/79-19, Show Cause and Stop Work Orders imposed on Brown & Root, Inc., the prime contractor, by the licensee. The rating was most heavily influenced by B&R's continued inability to correct the root causes of problems and take corrective action in a timely manner. The QA program's success is largely dependent upon the correction of the cause of deficiencies.

Although Houston Lighting and Power Company (HL&P) has taken affirmative steps and actions in the area described above, the implementation of corrective action measures and procedures is still considered a weak area. Therefore, the overall rating for licensee performance is determined to be Category 3, because of HL&P's inability to compel a significant improvement in B&R's performance in this area.

11. Board's Recommendations

The Board recommended augmented inspection of the South Texas Project through the transition phase of construction and into restart of construction until performance demonstrates that normal inspection activities may be resumed.

V. Supporting Data and Summaries

1. Reports Data

a. LER Numbers Reviewed (not applicable)

b. Construction Deficiency Reports

The licensee's system for reporting construction deficiencies is located in the Houston offices. Deficiencies identified onsite are forwarded to the Incident Review Committee (IRC) for evaluation. IE Inspection Report 50-498/81-07; 50-499/81-07 documented a review of this system which included: (1) reviewing licensee written reports for 1980, and (2) reviewing 58 IRC evaluations from April 26, 1977, to July 3, 1980.

Eleven reports from July 1, 1980, to June 30, 1981, were reviewed and evaluated. These deficiencies are described below:

(1) Design of Auxiliary Feedwater Pump (All environmental factors not considered in design.)

(2) Breakdown in QA Program Relative to Application of Paint to Steel and Concrete Surfaces Except for Liner Plate

(3) Reactor Containment Building Structural Steel Beams Loading

(4) Unacceptable Surface Condition of Weld in Main Steam Piping and Secondary Shield Wall Whip Restraints

(5) Cooling of Primary Shield Wall Penetration Insufficient Air Flow Between Reactor Coolant Nozzle and Seal Plate

(6) Inadequate Cable Tray Hanger Design

(7) Hilti Anchor Bolts Design Strength Inadequate

(8) American Bridge Structural Steel Welds Deficiencies

(9) Non-Approved Hilti Revised QA Manual

(10) Faulted Condition Heat Loads in Design of Portions of the HVAC System

(11) Computer Program Verification

A trend was noted relative to the deficiencies reported; that is, 7 of 11 were design problems. As a result of this trend and other information, a special NRC inspection of the

design engineering organization was requested on May 27, 1981. That inspection and review is still in progress and final results are not available.

c. Part 21 Reports

The licensee reported two 50.55(e) construction deficiencies as a result of two Part 21 reports which were reported to the licensee. These items are as follows:

(1) CONSIP Pump Shaft Failure

(2) Steam Generator Water Level Measurement System Error

2. Licensee Activities

The licensee's construction activities have been low during the subject period because of the NRC Show Cause Order and Stop Work Orders imposed by the licensee.

3. Inspection Activities

A special team was assigned to follow up on the IE Investigation 79-19 and the Show Cause Order. This effort continued during the entire reporting period and involved approximately 1318 inspector-hours. An insignificant number of inspector-hours was devoted to the routine inspection program because of follow-up and reactive inspection.

4. Investigation and Allegations Review

Twelve investigations were conducted during the subject period which involved 756 inspector-hours. These investigations are summarized below:

	Subject	Results
a.	Three allegations relative to (1) painting records, (2) weld rod oven power loss, (3) RCB-2 settlement.	Allegations were not confirmed.
b.	Seven allegations relative to (1) improper specification revision; (2) improper application of coatings, (3) design engineers not	Specification, improper coating; improper coating records at contractor were confirmed. Remainder were not confirmed.

	Subject	Results
	qualified, (4) QC coating records falsified, (5) coating records not authentic, (6) American Bridge coating records incomplete, (7) improper coating repair.	
c.	Two allegations relative to (1) B&R foreman intimidating employees, (2) B&R management took no action on electrical department problems.	The first allegation was confirmed; however, morale and personnel problems were turned over to HL&P management.
d.	One allegation relative to site personnel knowing that an NRC investigation was to occur.	Allegation confirmed.
e.	Eleven allegations relative to (1) B&R intimidation of employees, (2) inadequate inspection of materials leaving warehouse, (3) electrical personnel not qualified, (4) concrete form shifted, (5) HL&P/B&R forewarned of NRC inspection, (6) FREA procedure improper, (7) B&R performing work that should not have been performed, (8) low morale, (9) termination shack calibration practices improper, (10) B&R did not advise employees of results of employee survey, (11) procurement of electrical supplies improper.	All allegations confirmed except unqualified personnel and concrete form shift.
f.	One allegation relative to pipe sleeve weld defects.	Allegation not confirmed.
g.	Four allegations relative to (1) electrical shop records/ calibration, (2) storage of safety-related piping in lay down area "M", (3) storage of	Allegation (4) was confirmed but item was not safety-related.

	Subject	Results
	safety-related piping in fab shop area, (4) B&R piping isometric drawings differ from specification sheets.	
h.	Three allegations relative to (1) B&R foreman fired because he resisted production pressures, (2) B&R rehired personnel formerly fired because of conditions identified in IE Report 79-19, (3) Cadweld records inadequate and falsified.	Allegation (2) was confirmed and (3) had "some merit."
i.	One allegation relative to drug use at STP must affect quality of construction.	Allegation was not confirmed.
j.	Five allegations relative to (1) construction deficiencies not properly reported, (2) clearly promoted to project quality engineer not qualified, (3) B&R auditor at STP not qualified, (4) management intimidated an employee, (5) B&R engineer's experience inadequate for position to which he was to be promoted.	Allegations were not confirmed.
k.	Four allegations relative to (1) designers of STP piping systems are not competent, (2) supervisors signing/ approving drawings not competent, (3) Nuclear Power Service, Inc., is worst contractor onsite, (4) B&R stress analysis of piping system questioned.	Allegations (1) and (2) were not confirmed, while (3) was turned over to Region IV Vendor Inspection Branch.
l.	Two allegations relative to (1) permanent plant equipment not inspected and records falsified to show inspection results, (2) millwright foreman not qualified.	Allegations were confirmed.

5. Escalated Enforcement Actions

a. Civil Penalties, and

b. Orders

The NRC imposed a $100,000 civil penalty and issued a Show Cause Order to the licensee on April 30, 1980. The licensee paid the civil penalty and provided a complex and detailed response on July 28, 1980. In accordance with the Order, on August 19, 1980, a public meeting was held between NRC and licensee senior management to discuss the subject response. Senior representatives from B&R also attended. These proceedings were documented and placed in the Public Document Room.

As a result of this meeting, HL&P summarized all commitments made in the written response, commitments made between NRC and licensee management, and commitments made at the public meeting in HL&P letter (ST-HL-AE 533) dated September 18, 1980.

Parties to intervene requested that all construction work be stopped but this request was denied. However, the Commission did decide to have accelerated hearings on the QA portion for the operating license to determine the licensee management's character and competence. These hearings started on May 12, 1981, in Bay City, Texas, and are expected to extend into late fall 1981.

c. Immediate Action Letters

Nine immediate action letters were issued relative to confirming stop work actions imposed by the licensee. The following is a summary.

(1) Issued July 17, 1980, confirming licensee self-imposed Stop Work Order to check adequacy of controls for AWS welder qualifications and requalifications.

(2) Issued October 3, 1980, confirming licensee's commitments regarding re-examination, repair, and restart of AWS welding.

(3) Issued October 22, 1980, confirming licensee's commitments for additional AWS safety-related welding.

(4) Issued November 21, 1980, confirming licensee's commitments regarding initiating ASME welding activities.

(5) Issued January 5, 1981, confirming licensee's commitments regarding the ASME safety-related welding 10-Week Work Plan and resumption of safety-related AWS welding.

(6) Issued January 13, 1981, confirming licensee's commitments regarding initiating complex concrete work activities.

(7) Issued February 19, 1981, concerning substitution of certain ASME welding identified in the ASME safety-related welding 10-Week Work Plan.

(8) Issued March 31, 1981, confirming licensee's commitments regarding further limited ASME safety-related welding as outlined in licensee's 12-Week Work Plan.

(9) Issued April 16, 1981, confirming licensee's commitments regarding expanding complex concrete work activities.

6. Management Conferences Held During Appraisal Period

The following were management meetings held during the SALP reporting period:

a. At the request of the licensee, a management meeting was held on June 17, 1980, to discuss actions being developed regarding Show Cause Order items.

b. At the request of the licensee, a management meeting was held to discuss actions being taken regarding Show Cause Order items related to Special Investigation 79-19.

c. November 18, 1980, to discuss status of outstanding Show Cause Order items and restart of work.

d. March 23, 1981, to discuss restart to ASME welding and current status of Show Cause Order commitments.

FORM NRC 766
FEBRUARY 1978
(MC 0535)

UNITED STATES NUCLEAR REGULATORY COMMISSION
INSPECTION & ENFORCEMENT – STATISTICAL DATA

FACILITY NAME: SOUTH TEXAS PROJECT — INSPECTOR(S): — PRINCIPAL INSPECTOR: PHILLIPS
LICENSEE/VENDOR: HL&P — REVIEWER: CROSSMAN

AE TRANSACTION TYPE (CHECK ONE): ☐ Delete ☒ Insert ☐ Modify

DOCKET NUMBER (A): 05000498
OR LICENSE NO. (BY PRODUCT):

REPORT NO. (B): 8137

DATE(S) INSP/INVEST: FROM (C) 09/11/81 TO (D) 10/16/81

REGION CONDUCTING ACTIVITY (E): 4

F INSPECTION PERFORMED BY (32): 1 ☒ REGIONAL OFFICE STAFF 2 ☐ RESIDENT INSPECTOR 3 ☐ PERFORMANCE APPRAISAL TEAM

G TYPE OF ACTIVITY CONDUCTED (CHECK ONE BOX ONLY) (33-34)

INSPECTION:
02 ☐ SAFETY; 03 ☐ INCIDENT; 04 ☐ ENFORCEMENT; 05 ☐ MANAGEMENT AUDIT; 06 ☐ MANAGEMENT VISIT; 07 ☒ SPECIAL; 08 ☐ VENDOR; 09 ☐ MATL ACCT; 10 ☐ PLANT SEC.; 11 ☐ INVENT. VERIF; 12 ☐ SHIPMENT/EXPORT; 13 ☐ IMPORT

OTHER:
14 ☐ INQUIRY; 15 ☐ INVESTIGATION (IF INVEST. ALSO CHECK BLOCK S)

H INSPECTION OR INVESTIGATION WARNING (35): 1 ☒ ANNOUNCED 2 ☐ UNANNOUNCED

I INSPECTION SHIFT (36): 1 ☒ DAY SHIFT 2 ☐ OFF-SHIFT 3 ☐ WEEKEND/HOLIDAY

J INSPECTION/INVESTIGATION NOTIFICATION (CHECK ONE BOX ONLY) (37)
1 ☐ 591 2 ☒ REGIONAL OFFICE LETTER 3 ☐ REFERRED TO HQS FOR ACTION 4 ☐ REGION LETTER & HQS FOR ACTION

K INSPECTION/INVESTIGATION FINDINGS (CHECK ONE BOX ONLY) (38)
1 ☒ CLEAR 2 ☐ NONCOMPLIANCE 3 ☐ DEVIATION 4 ☐ NONCOMPLIANCE & DEVIATION

L ENFORCEMENT CONFERENCE HELD: 1 ☐ (39)

M NUMBER OF NONCOMPLIANCE ITEMS IN LETTER TO LICENSEE (40-41): 00

N NUMBER OF DEVIATION ITEMS IN LETTER TO LICENSEE (42-43): 00

NOTE: CHANGE MUST BE SUBMITTED ON 766 WHENEVER PREVIOUSLY CITED ITEM OF NONCOMPLIANCE IS OFFICIALLY DELETED FROM THE RECORD.

O NUMBER OF LICENSEE EVENTS (44-45):

P 46 INSPECTION FEE
1 ☐ NON-ROUTINE/VENDOR (No Fee) 2 ☐ ROUTINE (No Fee) 3 ☐ ROUTINE (Fee) 4 ☐ ROUTINE (Fee Reduced)

Q 47 CONTENTS 2.790D INFORMATION ☐ "S" YES

R REGIONAL OFFICE LETTER OR REPORT TRANSMITTAL DATE FOR INSPECTION OR INVESTIGATION

591 OR LETTER ISSUED TO LICENSEE (48-53): 061882 (M M D D Y Y)
REPORT SENT TO HQS FOR ACTION (54-59): (M M D D Y Y)
IMMEDIATE ACTION LETTER (60 DATE 65): (M M D D Y Y)

S SUBJECT OF INVESTIGATION (CHECK ONE BOX ONLY) (66-67)

TYPE A — 10 CFR 20.403:
01 ☐ INTERNAL OVEREXPOSURE
02 ☐ EXTERNAL OVEREXPOSURE
03 ☐ RELEASE TO UNREST. AREA
04 ☐ LOSS OF FACILITY
05 ☐ PROPERTY DAMAGE

TYPE B:
06 ☐
07 ☐
08 ☐
09 ☐
10 ☐

10 CFR 20.405:
11 ☐ INT. OVEREXPOSURE
12 ☐ EXT. OVEREXPOSURE
13 ☐ EXCESS RAD. LEVELS
14 ☐ EXCESS CONC. LEVELS

MISC.:
15 ☐ CRITICALITY
16 ☐ LOSS/THEFT
17 ☐ MUF
18 ☐ TRANSPORTATION
19 ☐ CONTAM/LEAKING SOURCE
20 ☐ ENVIRONMENTAL EVENT
21 ☐ EQUIP. FAILURE
22 ☐ ALLEGATION/ COMPLAINT
23 ☐ PUBLIC INTEREST
24 ☐ SABOTAGE
25 ☐ ABNORMAL OCCUR
26 ☐ OTHER

HEADQUARTERS ENTRIES

T HQS ACTION ON INSP/INVEST REFERRED BY REGION (68-69): (See Reference List for Codes)

U DATE HQS ENFORCEMENT LETTER, NOTICE, ORDER ISSUED (70-75): (M M D D Y Y)

V CIVIL PENALTY ISSUED (1) (76):

W DATE 766 ENTERED INTO COMPUTER FILE (MO/YR) (77-80): (M M Y Y)

NOTE: BLOCKS K TO N MUST BE VERIFIED BY IE: HQS WHENEVER ENTRIES ARE MADE IN BLOCKS T, U AND V

AITS REFERENCE

FORM NRC 766 - SIDE 2

USNRC – INSPECTION & ENFORCEMENT STATISTICAL DATA

(NOTE: % COMPLETE AND STATUS, LEAVE BLANK FOR MC 92, 93 & 94 PROCEDURES AND 30 702, 30 703 & 30 800)

(NOTE: STATUS CODING,
BLANK TO REMAIN OPEN
C CLOSED
L REOPEN & LEAVE OPEN
P REOPEN THIS TRANSACTION ONLY)

(NOTE: MODULE REQUIRING FOLLOWUP,
USE ONLY WHEN MODULE INSPECTED IS 92 701B.)

		MODULE TRACKING INFORMATION					NONCOMPLIANCE									
		MODULE NO. INSP. (PHASE, MANUAL, CHAP, PROC., NO., LEVEL)	DIRECT INSP EFFORT MAN HRS EXPENDED THIS INSP	% COMPLETE TO DATE	STATUS	MODULE REQ FOLLOWUP (PHASE, MANUAL, CHAP, PROC., NO., LEVEL)	N/C CODE	SEV	N/C CODE	SEV	N/C CODE	SEV	N/C CODE	SEV	N/C CODE	SEV
B	0	0 9 9 0 2 1 B	0 1 5													
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LINE COLUMN NUMBER SHOWN IN BOTTOM LINE

☐ CONTINUES ON SUPPLEMENT SHEET

FORM NRC 766
FEBRUARY 1975
(MC 0535)

UNITED STATES NUCLEAR REGULATORY COMMISSION
INSPECTION & ENFORCEMENT – STATISTICAL DATA

FACILITY NAME: SOUTH TEXAS PROJECT (INSPECTOR(S): _____ PRINCIPAL INSPECTOR: HILLIS
LICENSEE/VENDOR: H L & P _____ PR. INSP: CROSSMAN

AE TRANSACTION TYPE (CHECK ONE): ☐ Delete ☒ Insert ☐ Modify

DOCKET NUMBER (2–9): 0 5 0 0 0 4 9 9

OR LICENSE NO. (BY PRODUCT) (2–14):

A REPORTING (B) (15–18): 8 1 3 7

DATES INSP/INVEST/INSP FROM (C) (19–24): 0 9 / 1 8 / 8 1 (M M D D Y Y)

TO (D) (25–30): 1 0 / 6 8 / 8 1 (M M D D Y Y)

REGION CONDUCT NO. ACTIVITY (E) (31): 4

F INSPECTION PERFORMED BY (32): 1 ☒ REGIONAL OFFICE STAFF 2 ☐ RESIDENT INSPECTOR 3 ☐ PERFORMANCE APPRAISAL TEAM

G TYPE OF ACTIVITY CONDUCTED (CHECK ONE BOX ONLY) (33-34)

INSPECTION
02 ☐ SAFETY
03 ☐ INCIDENT
04 ☐ ENFORCEMENT
05 ☐ MANAGEMENT AUDIT
06 ☐ MANAGEMENT VISIT
07 ☒ SPECIAL
08 ☐ VENDOR
09 ☐ MATL ACCT
10 ☐ PLANT SEC.
11 ☐ INVENT. VERIF.
12 ☐ SHIPMENT/EXPORT
13 ☐ IMPORT

OTHER
14 ☐ INQUIRY
15 ☐ INVESTIGATION
(IF INVEST. ALSO CHECK BLOCK 5)

H INSPECTION OR INVESTIGATION WARNING (35): 1 ☒ ANNOUNCED 2 ☐ UNANNOUNCED

I INSPECTION SHIFT (36): 1 ☒ DAY SHIFT 2 ☐ OFF-SHIFT 3 ☐ WEEKEND/HOLIDAY

J INSPECTION/INVESTIGATION NOTIFICATION (CHECK ONE BOX ONLY) (37)

1 ☐ 591 2 ☒ REGIONAL OFFICE LETTER 3 ☐ REFERRED TO HQS FOR ACTION 4 ☐ REGION LETTER & HQS FOR ACTION

K INSPECTION/INVESTIGATION FINDINGS (CHECK ONE BOX ONLY) (38)

1 ☒ CLEAR 2 ☐ NONCOMPLIANCE 3 ☐ DEVIATION 4 ☐ NONCOMPLIANCE & DEVIATION

L ENFORCEMENT CONFERENCE HELD: 1 ☐ 39

M NUMBER OF NONCOMPLIANCE ITEMS IN LETTER TO LICENSEE (40–41): 0 0

N NUMBER OF DEVIATION ITEMS IN LETTER TO LICENSEE (42–43): 0 0

NOTE: CHANGE MUST BE SUBMITTED ON 766 WHENEVER PREVIOUSLY CITED ITEM OF NONCOMPLIANCE IS OFFICIALLY DELETED FROM THE RECORD.

O NUMBER OF LICENSEE EVENTS (44–45):

P 46 INSPECTION FEE
1 ☐ NON-ROUTINE/VENDOR (No Fee) 2 ☐ ROUTINE (No Fee) 3 ☐ ROUTINE (Fee) 4 ☐ ROUTINE (Fee Reduced)

Q 47 CONTENTS 2.790D INFORMATION ☐ 'S' YES

R REGIONAL OFFICE LETTER OR REPORT TRANSMITTAL DATE FOR INSPECTION OR INVESTIGATION

591 OR LETTER ISSUED TO LICENSEE (48–53) M M D D Y Y
REPORT SENT TO HQS FOR ACTION (54–59) M M D D Y Y
IMMEDIATE ACTION LETTER (60 DATE 65) M M D D Y Y

S SUBJECT OF INVESTIGATION (CHECK ONE BOX ONLY) (66-67)

TYPE A 10 CFR 20.403
01 ☐ INTERNAL OVEREXPOSURE
02 ☐ EXTERNAL OVEREXPOSURE
03 ☐ RELEASE TO UNREST. AREA
04 ☐ LOSS OF FACILITY
05 ☐ PROPERTY DAMAGE

TYPE B
06 ☐
07 ☐
08 ☐
09 ☐
10 ☐

10 CFR 20.405
11 ☐ INT. OVEREXPOSURE
12 ☐ EXT. OVEREXPOSURE
13 ☐ EXCESS RAD. LEVELS
14 ☐ EXCESS CONC. LEVELS

MISC
15 ☐ CRITICALITY
16 ☐ LOSS/THEFT
17 ☐ MUF
18 ☐ TRANSPORTATION
19 ☐ CONTAM/LEAKING SOURCE
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21 ☐ EQUIP. FAILURE
22 ☐ ALLEGATION/COMPLAINT
23 ☐ PUBLIC INTEREST
24 ☐ SABOTAGE
25 ☐ ABNORMAL OCCUR
26 ☐ OTHER

HEADQUARTERS ENTRIES

T HQS ACTION ON INSP/INVEST REFERRED BY REGION (68–69): (See Reference List for Code)

U DATE HQS ENFORCEMENT LETTER, NOTICE, ORDER ISSUED (70–75): M M D D Y Y

V CIVIL PENALTY ISSUED (76): 1

W DATE 766 ENTERED INTO COMPUTER FILE (MO/YR) (77–80): M M Y Y

NOTE: BLOCKS K TO N MUST BE VERIFIED BY IE: HQS WHENEVER ENTRIES ARE MADE IN BLOCKS T, U AND V

AITS REFERENCE

FORM NRC 766 – SIDE 2

USNRC – INSPECTION & ENFORCEMENT STATISTICAL DATA

(NOTE: % COMPLETE AND STATUS; LEAVE BLANK FOR MC 92, 93 & 94 PROCEDURES AND 30 702, 30 703 & 30 800)

(NOTE: STATUS CODING; BLANK – TO REMAIN OPEN; C CLOSED; L REOPEN & LEAVE OPEN; P REOPEN THIS TRANSACTION ONLY)

(NOTE: MODULE REQUIRING FOLLOWUP; USE ONLY WHEN MODULE INSPECTED IS 92 701B)

			MODULE TRACKING INFORMATION															NONCOMPLIANCE																	
			MODULE NO. INSP.						DIRECT INSP EFFORT MAN HRS EXPENDED THIS INSP		% COMPLETE TO DATE	STATUS	MODULE REQ FOLLOWUP						N/C		N/C		N/C		N/C		N/C								
			PHASE	MANUAL CHAP.	PROC. NO.			LEVEL					PHASE	MANUAL CHAP.	PROC. NO.			LEVEL	CODE	SEV	CODE	SEV	CODE	SEV	CODE	SEV	CODE								
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LINE COLUMN NUMBER SHOWN IN BOTTOM LINE

☐ CONTINUES ON SUBSEQUENT SHEET