



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

MAR - 3 1994

MEMORANDUM FOR: L. J. Callan
Regional Administrator

FROM: Samuel J. Collins
South Texas Project Restart Panel

SUBJECT: COMPLETION OF SOUTH TEXAS PROJECT UNIT 1 CONFIRMATORY ACTION
LETTER ITEMS AND RESTART ACTION PLAN STATUS

The purpose of this memorandum is to document the discussions and presentation to you on February 15, 1994, which informed you of the status of Houston Lighting & Power Company's (HL&P) actions to implement the South Texas Project (STP) Confirmatory Action Letter (CAL 4-93-04B) dated October 15, 1993, and the status of tasks associated with the STP Restart Action Plan for Unit 1.

Confirmatory Action Letter

On February 3, 1993, following a reactor trip, the Unit 2 turbine-driven auxiliary feedwater pump started and immediately tripped on overspeed. On February 4, 1993, Unit 1 was required to shut down as a result of repeated failures of the turbine-driven auxiliary feedwater pump to start on demand and operate without tripping on overspeed. As a result of these problems, NRC issued a Confirmatory Action Letter (CAL) to HL&P on February 5, 1993, and dispatched an augmented inspection team (AIT). The CAL required resolution of the overspeed trip condition affecting the turbine-driven auxiliary feedwater pumps and a briefing of NRC staff prior to restart of the unit.

In addition to the AIT activities, several special inspections were conducted at STP, including a diagnostic evaluation by the NRC office of Analysis and Evaluation of Operational Data conducted during the period of March 29 to April 30, 1993. The findings of these reviews resulted in supplements to the CAL issued on May 7, 1993 (CAL 4-93-04), and October 15, 1993 (CAL 4-93-04B). These supplements included issues that NRC considered of sufficient scope and safety significance to require resolution prior to either unit being restarted (Enclosures 1, 2, and 3).

Licensee Actions

In addition to the hardware related issues at STP, the NRC required HL&P to address programmatic problems, including work backlogs, postmaintenance testing shortcomings, outstanding modifications, operations staffing adequacy, fire protection equipment and training, management effectiveness in identifying, pursuing, and correcting plant problems, and the results of internal restart readiness reviews. In response, the licensee developed the

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Operational Readiness Plan submitted to the NRC in August 1993, which described specific actions to be taken prior to the resumption of power operation. Additionally, longer-term actions were described in the Business Plan submitted to NRC in October 1993. HL&P has initiated changes in the STP management from the Group Vice President, Nuclear to the Plant Managers, including a reorganization of the Nuclear Generation department.

On January 29, 1994, HL&P requested a meeting to brief the NRC on the status of the issues described in the February 5, 1993, CAL and its supplements. In the licensee's written submittal they described the actions taken in response to NRC concerns and included a summary of actions remaining prior to resumption of power operation. A public meeting was conducted at the site on February 14, 1994, and a briefing of the STP Restart Panel was conducted by teleconference on February 15, 1994, during which the licensee confirmed actions taken in preparation for the resumption of power operation of STP, Unit 1.

NRC Actions

The NRC Region IV Regional Administrator chartered the STP Review Panel on March 11, 1993. The STP Review Panel is composed of regional and program office managers and is to: (1) assure that a consistent approach to issues is being identified at STP and attempt to reach an agency consensus and united approach to addressing the problems at STP; (2) assure that the followup on safety significant issues is being properly coordinated and scheduled; (3) schedule significant meetings and inspections; (4) assure that the views and concerns of different NRC offices are properly addressed; and (5) assure proper coordination for the followup of issues that are identified by the Diagnostic Evaluation Team (DET) inspection.

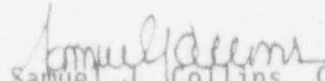
On April 12, 1993, it was determined that NRC Inspection Manual Chapter 0350, "Staff Guidelines for Restart Approval," was applicable for STP because of its extended shutdown and previous indications of serious deficiencies in licensee management effectiveness. The STP Review Panel assumed the role and responsibilities of the STP Restart Panel and issued the STP Restart Action Plan (Enclosure 4) which includes expected NRC actions required to be taken before restart of the STP Units.

In addition to the focused inspections conducted at STP since the shutdown of Units 1 and 2, an independent Operational Readiness Assessment Team (ORAT) inspection, led by the Special Inspection Branch of the Office of Nuclear Reactor Regulation, was conducted from December 6-10, 1993, and January 12-21, 1994. At the exit meeting conducted on January 21, 1994, the licensee committed to the resolution of issues regarding: (1) configuration management; (2) motor-operated valve opening under system pressure; and (3) surveillance weaknesses. The ORAT concluded that, pending the results of licensee actions concerning the above three items, the ORAT team would be generally supportive of a restart of Unit 1.

Based on the independent inspections and reviews conducted by the NRC staff and described in Enclosure 4 (STP Restart Action Plan), the licensee has satisfactorily completed the items specified in the CAL.

Restart Panel Meeting

The STP Restart Panel met on February 15, 1994, in accordance with NRC Manual Chapter 0350, "Staff Guidelines For Restart Approval," to review outstanding issues requiring resolution prior to restart of Unit 1. Based on the independent inspection and reviews conducted at STP and described in Enclosure 4, the satisfactory resolution of those items addressed in the February 14, 1994, public meeting, and confirmation of the completion of remaining issues on February 15, 1994, the Panel recommended approving the resumption of operation of STP, Unit 1, in accordance with the facility Technical Specifications. In accordance with the February 3, 1994, memorandum from Director, DRP to the STP Restart Panel augmented inspection team coverage of the unit restart will commence about 24 hours prior to entry into Mode 2 operations and will continue until Unit 1 has demonstrated successful operation.


Samuel J. Collins, Chairman
STP Restart Panel

Enclosures:

1. CAL, February 5, 1993
2. CAL, May 7, 1993
3. CAL, October 15, 1993
4. STP Restart Unit 1 Action
Plan, Revision 4

cc w/enclosures:

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Wadsworth, Texas 77483

Houston Lighting & Power Company
ATTN: James J. Sheppard, General Manager
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-5-

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E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE01)

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- L. J. Callan
- Branch Chief (DRP/A)
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- R. Bachmann, OGC, MS. 15-B-18
- A. Thadani, NRR M/S 8E2
- W. Russell, NRR M/S 12G18
- J. Roe, NRR M/S 13E4
- E. Adensam, NRR M/S 13E4
- RIV OEDO Coordinator, M/S 17G21
- STP Restart Panel Members
- C. Sudman, DRP

- Resident Inspector
- Lisa Shea, RM/ALF, MS: MNBB 4503
- DRSS-FIPB
- Project Engineer (DRP/A)
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RIV:RPC*	C:DRP/A*	<i>J for</i> SRV:DRP/A	D:DRP*	D:DRS*
SJCollins:myp	WDJohnson	DPLoveless	ACBeach	TPGwynn
2/ /94	2/ /94	2/2/94	2/ /94	2/ /94

AD:DRSS*	NRR*	NRR*	RIV:RPC	
DDChamberlain	LEKokajko	SCBlack	SJCollins	
2/ /94	2/ /94	2/ /94	2/3/94	

*previously concurred



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 NUCLEAR REGULATORY COMMISSION

REGION IV

811 RYAN PLAZA DRIVE, SUITE 400
 ARLINGTON, TEXAS 76011-8064

FEB - 5 1993

Docket 50-498
 50-499
 License NPF-76
 NPF-80
 CAL 4-93-04

Houston Lighting & Power Company
 ATTN: Donald P. Hall, Group
 Vice President, Nuclear
 P.O. Box 1700
 Houston, Texas 77251

SUBJECT: CONFIRMATORY ACTION LETTER

Pursuant to our telephone conversation on February 4, 1993, it is our understanding that South Texas Project, Units 1 and 2, will not be taken critical until you have briefed the NRC staff of the results of your efforts to correct the overspeed trip condition that is affecting the turbine-driven auxiliary feedwater pumps.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, and 10 CFR 2.204, you are required to notify me immediately if your understanding differs from that set forth above.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee. Nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, Pub. L. No. 96-511.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,


James L. Milhoan
Regional Administrator

cc:
Houston Lighting & Power Company
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Wadsworth, Texas 77483

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NRC Public Document Room

Texas Radiation Control Program Director



UNITED STATES
NUCLEAR REGULATORY COMMISSION

ENCLOSURE 2

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
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MAY - 7 1993

Dockets: 50-498
 50-499
Licenses: NPF-76
 NPF-80
CAL 4-93-04

Houston Lighting & Power Company
ATTN: William T. Cottle, Group
 Vice President, Nuclear
P.O. Box 1700
Houston, Texas 77251

SUBJECT: CONFIRMATORY ACTION LETTER SUPPLEMENT

This supplements my Confirmatory Action Letter of February 5, 1993, which noted Houston Lighting & Power Company's management agreement that South Texas Project, Units 1 and 2, will not be taken critical until the NRC Staff has been briefed on the results of your efforts to correct the overspeed trip condition which affected the turbine-driven auxiliary feedwater pumps.

Because of the number of issues that have been identified both by your staff and the NRC, you agreed, in our telephone conversation of May 7, 1993, to include the following additional topics in your briefing of the NRC staff which will be scheduled later.

- The Station Problem Report process, including process improvements, threshold, and the results of your review of existing reports for issues affecting equipment operability and safe plant operation;
- The Service Request backlog, including reduction accomplished during the current outages and your review of outstanding Service Requests for issues affecting equipment operability, safe plant operation, and operator work-arounds;
- The postmaintenance test program, including corrective actions in response to recent violations and other process improvements and the basis for your confidence that equipment removed from service for maintenance is properly restored to an operable status;
- The outstanding design modifications, temporary modifications, and other engineering backlog items, including your review of these for issues affecting equipment operability, safe plant operation, and operator work-arounds.

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- Staffing in the operations department, including adequacy of current staffing levels, plans for replacing planned and unexpected losses to support safe plant startup and operation, and the adequacy of staffing under emergency conditions;
- The status of fire brigade leader training, including verification that this training meets regulatory requirements;
- The status of the fire protection computers, including reliability and functionality of operator interface;
- Management effectiveness in identifying, pursuing, and correcting plant problems, including any plans for independent reviews; and
- The results of your internal restart readiness reviews.

It is important that a thorough review of the backlogs in the areas of Service Requests, engineering items, and Station Problem Reports be conducted to assure that unknown equipment operability problems are identified and corrected. An example of a recent problem affecting safety-related equipment operability which had previously been identified in a Service Request was the missing screws in the Qualified Display Processing System. Weaknesses in the postmaintenance testing program have resulted in inoperable equipment being returned to service. The many outstanding design modifications should be carefully prioritized to ensure that those with importance to safety of operations are implemented in a timely manner and that no potential operability issues exist.

In view of the marginal staffing level in the operations department, it is important that unnecessary burdens and distractions be removed and that you have a plan in place to provide for contingencies and losses. Adequacy of the initial training for fire brigade leaders is an open issue and their overdue requalification training has resulted in an extra burden being placed on nonlicensed operators. Reliability of and operator interface difficulties with the fire protection computers has placed an extra burden on operators and could delay response to a fire in the plant. The outstanding temporary modifications which require additional operator actions, such as manual operation of automatic control systems, should be restored to minimize their impact on the efficiency of operators.

Weaknesses in problem identification, problem reporting, safety impact evaluation, root cause analysis, and corrective action processes have been observed in both the Station Problem Report process and in the Service Request process, indicating ineffective management of these areas.

This listing of topics for discussion is intended to focus the briefing on staff concerns involving potential safety issues. If other such topics are identified prior to the briefing, you will be advised by letter or telephone. Please inform me when your staff has made significant progress in addressing

these issues so I can schedule a special inspection prior to the briefing. All provisions of the February 5, 1993, letter remain in effect. If you have any questions, please feel free to contact me or Bill Beach of my staff.

Sincerely,


James L. Milhoan
Regional Administrator

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ENCLOSURE 3

REGION IV

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OCT 15 1993

Dockets: 50-498
50-499
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NPF-80
CAL 4-93-04B

Houston Lighting & Power Company
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P.O. Box 1700
Houston, Texas 77251

SUBJECT: CONFIRMATORY ACTION LETTER SUPPLEMENT 2

This is the second supplement to my Confirmatory Action Letter of February 5, 1993, which noted Houston Lighting & Power Company's management agreement that South Texas Project, Units 1 and 2, will not be taken critical until the NRC staff has been briefed on the results of your efforts to correct the overspeed trip condition which affected the turbine-driven auxiliary feedwater pumps.

As discussed with Mr. John Groth in a public meeting in Arlington, Texas, on October 5, 1993, the following topics have been identified as additions to the issues which must be resolved prior to startup of either South Texas Project unit. In a telephone conversation on October 15, 1993, you acknowledged these issues and agreed that these topics would be addressed in your briefing of the NRC staff in a meeting to be scheduled prior to unit startup.

The additional topics are:

- Effectiveness of the SPEAKOUT program;
- Standby diesel generator reliability;
- Essential chiller reliability;
- The system certification program;
- Reliability and operability of the feedwater isolation bypass valves;
- Adequacy of tornado damper testing; and
- Acceptability of the emergency preparedness accountability drill results.

These are not new issues, but they were considered to be significant following reviews of the Diagnostic Evaluation Report, your Operational Readiness Program, the allegation process, and recent NRC inspection findings. The complete results of these reviews are documented in NRC Inspection Report 50-498/93-31; 50-499/93-31. This listing of topics for discussion is

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intended to focus the briefing on staff concerns involving potential safety issues. If other such topics are identified prior to the briefing, you will be advised by letter or telephone. Please inform me when your staff has made significant progress in addressing these issues so I can schedule special inspections prior to the briefing. All provisions of the February 5, 1993, letter and its supplement of May 7, 1993, remain in effect. If you have any questions, please feel free to contact me or Mr. Art Howell of my staff.

Sincerely,


James L. Milhoan
Regional Administrator

cc:
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