

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-498/90-36  
50-499/90-36

Operating License: NPF-76  
NPF-80

Dockets: 50-498  
50-499

Licensee: Houston Lighting & Power Company (HL&P)  
P.O. Box 1700  
Houston, Texas 77251

Facility Name: South Texas Project (STP), Units 1 and 2

Inspection At: STP, Matagorda County, Texas

Inspection Conducted:

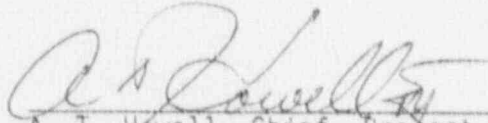
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Approved:

  
A. T. Howell, Chief, Project Section D  
Division of Reactor Projects

12-11-90  
Date

Inspection Summary

Inspection Conducted November 5-9, 1990 (Report 50-498/90-36; 50-499/90-36)

Areas Inspected: Special, announced inspection, including followup to the TMI action items as they applied to Unit 2 and loss of decay heat removal program enhancements.

Results: Within the areas inspected, one deviation was identified for failure to provide an administrative aide on all operating shift crews (paragraph 2.b). The licensee has incorporated the TMI action item requirements into the hardware and programmatic aspects of the facility.

DETAILS

1. Persons Contacted

- \*S. D. Phillips, Licensing Engineer
- \*A. W. Harrison, Supervising Engineer, Licensing
- \*G. N. Midkiff, Plant Operations Manager
- \*M. R. Wisenburg, Plant Manager

In addition to the above, the inspectors also held discussions with various licensee, architect engineer (AE), maintenance, and other contractor personnel during this inspection.

\*Denotes those individuals attending the exit interview conducted on November 9, 1990.

2. Temporary Instruction (TI) 2515/065, "TMI Action Plan Requirement Followup"

The inspectors reviewed each of the following TMI action item requirements to verify that the the licensee had appropriately considered their implementation into Unit 2 equipment and programs. In general, this inspection verified that applicable programs and procedures were developed, approved, distributed, and implemented; and equipment was installed or modified and was placed in operation. The licensee has established a means of identifying procedural applicability to either Unit 1, Unit 2, or both units. This is accomplished by a 1, 2, or 0, respectively, preceding the procedure letter designator.

a. (Closed) TMI Items I.A.1.1.1 and I.A.1.1.3: Shift Technical Advisors (STAs) on Duty and Appropriately Trained

These TMI items were reviewed and closed for Unit 1 in NRC Inspection Report (IR) 50-498/87-08; 50-499/87-08. The licensee has implemented Procedure OPGP03-ZO-0008, Revision 2, "Shift Technical Advisor," for both units. This procedure incorporates the previous commitments from Units 1 and 2. The inspector reviewed an STA shift assignment schedule for the months of November and December 1990 and January 1991 and verified that appropriate STA coverage would be provided. These TMI items are closed for Unit 2.

b. (Closed) TMI Item I.A.1.2: Shift Supervisor Responsibilities

This TMI item concerned delegation of nonsafety-related duties by the shift supervisor to administrative personnel. The licensee's implementation of this item was reviewed and closed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08. The licensee has appropriately identified the duties which the shift supervisor may delegate to the administrative aide. The position description for an administrative

aide is the same as that previously reviewed for Unit 1. However, the inspector noted that the licensee had revised the times when the administrative aide would be on duty. A review of the Unit 2 shift schedule for November 1990 identified that there was no assigned administrative aide coverage from day shift Saturday through Monday, 6 a.m. This partial coverage appears to deviate from the STP Updated Final Safety Analysis Report (UFSAR) Section 13.1.2.2.1, and the Safety Evaluation Report (SER), Section 13.5.1.1. The UFSAR states that the administrative aide reports to the shift supervisor on his shift. The SER states that each shift will have administrative aides to relieve the shift supervisor of routine administrative duties and to process and route various records, logs, and correspondence. The failure to provide an administrative aide on each shift is an apparent deviation (498/9036-01; 499/9036-01). During the exit meeting, the licensee indicated that they did not intend to provide an administrative aide on Saturday or Sunday shifts. The licensee was reviewing the need to modify the commitments made in the SER.

Item IV.F of the administrative aide position description states that the administrative aide will "Act in assigned position for Emergency Response Organization in accordance with Section C of the Station Emergency Plan, when required." Figure C-1 of the Station Emergency Plan shows a shift administrative assistant normally available. The licensee should evaluate reassignment of duties if this person were not on shift during an emergency. The licensee has met the requirements of this TMI action item, and it is, therefore, closed for Unit 2.

- c. (Closed) TMI Items I.A.1.3.1 and I.A.1.3.2: Excessive Overtime is Avoided on Shift Operating Crews and Minimum Staffing Requirements are Maintained

These items were discussed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08, and Item I.A.1.3.2 was closed. Item I.A.1.3.1 was further discussed in NRC IR 50-498/87-23 and closed in NRC IR 50-498/87-39; 50-499/87-39. The Unit 1 and 2 minimum staffing requirements are now promulgated by Procedure OPGP03-ZO-0004, Revision 11, "Plant Conduct of Operations." The use of overtime is controlled by Procedures OPGP03-ZO-0004 and OPGP02-ZA-0060, Revision 2, "Overtime Approval Program." These procedures establish the guidelines for the use of overtime to assure it does not become excessive. These TMI items are closed for Unit 2.

- d. (Closed) TMI Item I.C.1.1, I.C.1.2.B, and I.C.1.3.B: Evaluation and Development of Procedures for Transients and Accidents

This item involved development of guidelines and procedures for a small break loss of cooling accident (LOCA), inadequate core cooling, and other transients and accidents. This item was discussed and closed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08. A team inspection of the development and implementation of emergency

operating procedures (EOPs) was performed later. This inspection reviewed the EOPs used for both units. The inspection results are documented for both units in NRC Inspection Report 50-498/88-68; 50-499/88-68. The inspectors identified several violations and open items relating to EOPs during the EOP team inspection. Although these violations and open items represented areas where the EOPs needed to be improved, the licensee's EOPs were found to be adequate. The licensee's EOPs were further inspected, and the results reported in NRC IR 50-498/90-21; 50-499/90-21. During this earlier inspection, the licensee demonstrated that they had improved the EOPs, but that the EOP upgrade activities were not yet complete.

The following deficiencies regarding the licensee's EOP upgrade program remain open pending follow-up inspections:

- o Violation 498/8868-02; 499/8868-02, "Inadequate EOPs": It was determined in NRC IR 50-498/90-21; 50-499/90-21 that EOP inadequacies were corrected with minor exceptions. However, this violation is open pending completion of an NRC review and field walkdown of selected EOPs.
- o Open Item 498/8868-05; 499/8868-05, "Inadequate Emergency Lighting": The item is open pending review of licensee's actions.
- o Open Item 498/8868-06; 499/8868-06, "Environmental Conditions Associated with EOP and Off-Normal Procedure Actions": This item is open pending NRC review of the licensee study associated with the environmental conditions.
- o Violation 498/8868-07, "Failure to Have a Comprehensive System of Planned and Periodic Audits to Verify Compliance and to Determine the Effectiveness of the EOP Program": This item is open pending completion of planned audits by the licensee and review of results by the NRC.

With the exception of Violation 498/8868-07, the inspector was informed that the licensee has completed their actions on all the above items. The licensee has scheduled an audit in response to Violation 498/8868-07, but it has not been completed. The inspector reviewed the results of the above NRC IRs and concluded that the generic requirements of TMI Item 1.C.1 have been satisfied. TMI Item 1.C.1 together with Sub-items 1.C.1.2.B, and 1.C.1.3.B are closed for Unit 2.

e. (Closed) TMI Item I.C.2: Shift and Relief Turnover Procedures

This item was closed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08. Procedure OPGP03-ZA-0063, Revision 8, "Plant Operations Shift Turnover," which is common for both units, appeared to be effective in ensuring that watch standers are aware of critical plant parameters

and the status of plant systems including abnormal operating configurations. The inspectors have observed shift briefing meetings held subsequent to watch station turnover and found that all shift personnel were aware of plant status and operating plans. However, the inspector did note that the post watch station turnover held by the shift supervisor with the oncoming crew was not proceduralized. This crew briefing provides an opportunity to verify that all turnover information provided is consistent. The operations manager stated that he is reviewing the above procedure and will review the need to proceduralize the crew briefing. This TMI item is closed for Unit 2.

f. (Closed) TMI Item I.C.3: Shift Supervisor Responsibilities Management Directive

This item was closed for Unit 1 in NRC IR 50-498/87-08; 59-499/87-08. The unit common Procedure OPGP03-ZO-0004, Revision 11, "Plant Conduct of Operations," defined the duties, responsibilities, and authority of the shift supervisor and control room operators. The inspector reviewed memoranda dated February 9, 1990, and February 10, 1990, from the nuclear group vice-president which described the command authority for direction of licensed operator activities. These directives were found to be appropriate. This TMI item is closed for Unit 2.

g. (Closed) TMI Item I.C.4: Control Room Access

This item was closed for Unit 1 in NRC IR 50-498/87-23; 49-499/87-23. The unit common Procedure OPGP-ZO-0004, Revision 11, "Plant Conduct of Operations," continued to contain sufficient requirements and instructions for the shift supervisor to properly maintain control room access control during all plant conditions. This TMI item is closed for Unit 2.

h. (Closed) TMI Item I.C.5: Feedback of Operating Experience

This item was closed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08. Procedure IP-2.2Q, Revision 5, "Operating Experience Review," continued to contain adequate instructions for screening and review of industry and internally generated operating experience information. Operating experience reports were listed as required reading in the licensed operator requalification training program. Procedure IP-8.9Q, Revision 2, "Licensed Operator Requalification," identified the operating experience reports as part of the requalification training program. This item was inspected and found satisfactory for both units in NRC IR 50-498/90-01; 50-499/90-01. This TMI item is closed for Unit 2.

i. (Closed) TMI Item I.C.6: Verification of Correct Performance of Operating Activities

This item was closed for Unit 1 in NRC IR 50-498/87-08; 59-499/87-08. Procedure OPGP03-ZA-0010, Revision 11, "Plant Procedure Compliance, Implementation, and Review," continued to specify procedure compliance requirements and methods for independent verification. Procedure OPGP03-ZA-0039, Revision 9, "Plant Procedures Writer's Guide," continued to include appropriate instructions for including independent verifications in plant procedures. Procedure OPGP03-ZO-0004, Revision 11, "Plant Conduct of Operations," incorporated requirements for the shift supervisor to release equipment for testing, maintenance, or modification and to assure independent verification of equipment returned to service. These requirements were governed as a whole in Procedure OPGP03-ZO-0005. This TMI item is closed for Unit 2.

j. (Closed) TMI Item II.B.1.2 and II.B.1.3: Reactor Coolant System (RCS) Vents

These TMI items required that each applicant install RCS and reactor vessel head high point vents which can be remotely operated from the control room and issue procedures to govern their usage.

- STP UFSAR, Appendix 7A, addresses NUREG-0737, Item II.B.1, in regard to safety analysis of design for seismic and LOCA events, with 10 CFR 50.44 and .46 describing the acceptance criteria.
- STP SER, Section 5.4.12, concluded that the STP design of the RCS high point vents was satisfactory and meets the requirements of NUREG-0737.
- STP Procedure OPOP05-EO-FRI3, Revision 0, "Response to Voids in Reactor Vessel," provided the necessary information to the operator for initiating and terminating vent usage in emergency conditions. Procedure 1POP05-EO-FRI3, Revision 1, was reviewed for acceptance as part of the inspection for Unit 1 (NRC IR 50-498/87-08; 59-499/87-08) and found acceptable. Because of the similarity of Units 1 and 2, OPOP05-EO-FRI3, Revision 0, which applies to both units, is acceptable.
- STP Procedure 2POP02-RC-0003, Revision 2, "Filling and Venting the Reactor Coolant System," and 2POP03-ZG-0001, Revision 3, "Plant Heatup," provided procedural steps for vent valve lineup and operations when cold.
- STP TS 3.4.11 provides the operability requirements of the reactor vessel head vent system (RVHVS).
- STP Drawing 5R149F05001#2, Revision 14, shows the piping and valve arrangement of the Unit 2 RVHVS. This arrangement meets

the design requirements as stated in the STP UFSAR and was accepted by the staff in the STP SER.

- ° The following electrical one-line diagrams were reviewed: 9-E-DJAA01#2, Revision 12; 9-E-DJAC-01#2, Revision 12; 9-E-DJAE-01#2, Revision 13; and 9-E-RC19-01#2, Revision 9. From these drawings it was determined that the RVHVS is supplied power from a Class IE power source.
- ° The Unit 2 "Pump and Valve Inservice Test Plan" lists the RVHVS valves with information provided as to class of valves, category of system, fail position, normal position, and test requirements.

These TMI items are closed for Unit 2.

- k. (Closed) TMI Item II.B.2.3: Design Review of Plant Shielding and Environmental Qualification of Equipment for Spaces/Systems Which May Be Used in Post-Accident Operations

This TMI item requires that each licensee perform a radiation and shielding-design review of the spaces around systems that may, as a result of an accident, contain highly radioactive materials. Each licensee is required to provide for adequate access to vital areas and protection of safety equipment by design changes, increased permanent or temporary shielding, or postaccident procedural controls.

STP UFSAR Appendix 7A addresses NUREG-0737, Item II.B.2, with the design dose rate for personnel in a vital area not to exceed the guidelines of General Design Criteria (GDC)-19.

STP SER, Section 12.3.2, concluded that the shielding design followed the guidance in Regulatory Guide 8.8, satisfies the facilities design objectives, and was acceptable. The SER also stated that a design review of station shielding was performed to ensure the accessibility of vital access after an accident.

The licensee performed detailed source term assessments and design reviews of station shielding to ensure that the equipment rooms, postaccident sampling system areas, radiation protection counting room, and radwaste counting room were accessible after an accident. The licensee also prepared a set of postaccident radiation zone maps, which apply to both units, depicting the radiation levels throughout the plant immediately following a design-basis accident. Calculations for areas designated for continuous occupancy (control room envelope and technical support center) indicated that GDC 19 will not be exceeded. This TMI item is closed for Unit 2.

1. TMI Item II.B.3.1 and II.B.3.4: Postaccident Sampling System (PASS)

These TMI items required that a design and operational review of the reactor coolant and containment atmosphere sampling line systems be performed to determine the capability of personnel to promptly obtain a sample under accident conditions without incurring a radiation exposure to any individual in excess of 3 and 18 3/4 rem to the whole body or extremities, respectively. In Appendix 7A and Section 9.3.2 of the UFSAR, the licensee described their PASS. Section 9.3.2.2 of Supplement 2 to the SER (NUREG-0781) states that the PASS meets the criteria of Item II.B.3 and is acceptable.

The inspection of the PASS for Unit 1 was documented in NRC IR 50-498/87-20; 50-499/87-20. The PASS was evaluated as to its ability to function and to allow reactor coolant samples to be obtained during an accident involving severe degraded core conditions. Licensee procedures for the operation and preventive maintenance of the PASS were also reviewed. Two apparent design deficiencies were identified: (1) the use of mechanical joints on sample inlet and recirculation lines; and (2) location of the rework area radiation monitor (ARM). The licensee implemented the necessary corrections. These corrections were reviewed and found to be acceptable. This review is documented in NRC IR 50-498/88-10; 50-499/88-10.

For Unit 2, the inspector reviewed Drawings 5Z549Z4750#1 and 5Z549Z4750#2 for verification of the similarity of the PASS between the two units. In addition, Procedures JPCP08-AP-0002, "Operational Maintenance of the Post Accident Sampling System," OPCP08-AP-0003, "Post-Accident Sampling of Liquids and RCB Atmosphere at PASS," OPCP08-AP-0005, "Determination of Radionuclides Post Accident," and OPCP08-AP-0006, "Backup Determination of Boron Post Accident," were found applicable for both units.

Field Change Request (FCR) 2-J-FST-0530 controlled the removal of mechanical joints and installation of socket weld tube fittings for Unit 2. The licensee added additional radiation monitor in the PASS laboratory near the electrical and sample panels to satisfy the concerns regarding dose rate information to the operators. Because of similarity of the PASS between the two units, the results of the Unit 1 inspection are applicable to Unit 2. These TMI items are closed for Unit 2.

m. (Closed) TMI Item II.B.4.2.A and II.B.4.2.B: Training for Mitigating Core Damage

The licensee was required to develop and implement a training program to teach the use of installed equipment and systems to control or mitigate accidents in which the core is severely damaged.

- o STP UFSAR, Appendix 7A, states that training is provided as described in the UFSAR, Section 13.2.1.1.



- ° The staff concluded in the STP SER that the applicant met Item II.B.4, which includes "..." subjects in Enclosure 3 of Mr. H. R. Denton's letter of March 28, 1980. Also, the STAs and all operating personnel, including licensed operators, appropriate managers, instrument and control (I&C) technicians, HP technicians, and chemistry technicians, receive training commensurate with their responsibilities.
- ° During the inspection of licensed operator training program, the following lesson plans were reviewed: LOT502.07.L, "Vital Process Instrumentation Accident Response," LOT502.08.L, "Accident Response of Core Incore Instrumentation," LOT502.09.L, "Accident Response of Excore Nuclear Instruments," and LOT502.11.L, "Radiological Aspects of Core Damage." The lesson plans met the requirements of NUREG-0737. The same instructions are given to all personnel, regardless of assignment to Unit 1 or 2.
- ° Lesson Plans CAT300.1, "Chemical Analysis Training," and RTP001.61, "Radiation Protection Technician Training, Radiological Aspects of a Core Damage Accident," are used for instruction of chemists and health physicists, respectively. Both plans adequately covered the TMI action item requirements.
- ° Lesson Plan ICT921.01 is presently used for the instruction of I&C technicians. This plan had been previously reviewed and found acceptable.

These TMI items are closed for Unit 2.

n. (Closed) TMI Item II.D.3.1: Direct Indication of Relief and Safety Valve Position

This TMI item requires that the reactor coolant system relief and safety valves be provided with a positive indication (in the control room) of valve position. The valve position indication must be seismically and environmentally qualified.

The NRC staff has concluded in the SER for STP that the design used by the licensee to meet this requirement meets the guidelines of NUREG 0737 and is acceptable. The inspector reviewed the Unit 2 design drawings and verified that they depict equipment that is essentially identical to that installed in Unit 1. The following drawings were reviewed:

- ° 5R149F05003, Revision 1, "Piping and Instrumentation Diagram RCS Pressurizer";
- ° TD-1768, Revision B, "Hi-Temp Accelerometer, Model NOT838";

- ° D-440, Sheets 1 and 2, Revision 5, "Arrangement, Safety Relief Valve Position Indication Cabinet";
- ° D-453, Sheets 1, 2, 3, 4, 5, and 6, Revision 5, "Schematic, Safety Relief Valve Position Indication System";
- ° 9-E-MS22-01, Revision 2, "Elementary Diagram, Master Block Diagram, Safety Relief Valve Position Indication System"; and
- ° 5R-14-9-Z-42160, Revision 5, "Reactor Coolant Pressurizer Power Relief Valves Logic Diagram, System:RC."

The inspector concluded that the Unit 2 design is essentially identical to that of Unit 1. Furthermore, the inspector confirmed that the equipment has been installed by conducting a walkdown of the Unit 2 control room. This TMI item is closed for Unit 2.

- o. (Closed) TMI Item II.E.1.1.2 and II.E.1.1.3: Auxiliary Feedwater System (AFWS) Evaluation

The Office of Nuclear Reactor Regulation required reevaluation of the AFWS for all pressurized water reactor (PWR) operating plant licensees and operating licensee applicants. This action included:

- ° A simplified AFWS reliability analysis that uses event-tree and fault-tree logic techniques to determine the potential for AFWS failure under various loss-of-main feedwater transient conditions. Particular emphasis was given to determine potential failures that could result from human errors, common causes, single-point vulnerabilities, and maintenance outages.
- ° Perform a determinant review of the AFWS using the acceptance criteria of Standard Review Plan Section 10.4.9 and associated Branch Technical Position ASB 10-1 as principal guidance.
- ° Reevaluate the AFWS flowrate design bases and criteria. The STP SER, which is applicable to both units, concluded in Section 10.4.9 that the design-basis AFWS flow requirements were acceptable.

STP Supplemental SER (SSLSR1) concluded that the applicant had complied with guidelines of NUREG-0737 Action Item II.E.1.1 concerning the AFWS reliability analysis and that the AFWS unavailability per demand for STP is compatible with staff guidance in SER Section 10.4.9. These TMI items are closed for Unit 2.

- p. (Closed) TMI Item II.E.1.2.1.A, II.E.1.2.1.B, II.E.1.2.2.A, II.E.1.2.2.C: AFWS Initiation and Flow Indications

These TMI action items required the licensee to provide the AFWS with initiation and flow monitoring capabilities.

- The inspector reviewed the STP SER supplements which were issued after Unit 1 licensing. The previous staff review of the STP SER, which verified that AFWS design met the guidelines of NUREG-0737, was verified to be valid for Unit 2. The previous staff review results are documented in NRC IR 50-498/87-08; 50-499/87-08.
- Inspectors had observed testing of the AFWS during the initial startup of Unit 2. The system was noted to respond to the correct initiation signals. Local and remote flow monitoring capabilities had been provided. The licensee has established a surveillance program which verified the operability of the initiation signals and the flow monitoring instrumentation.
- The inspector reviewed two recent licensee event reports (LERs): 499/90-04, "Reactor Trip on Low Steam Generator Level Due to a Feedwater Regulatory Valve Failure," and 499/90-13, "Reactor Trip Caused by Manipulation of the Incorrect Reactor Trip Breaker Test Actuation Pushbutton." During these two events, the AFWS actuated on the correct initiation signal, and the operators were able to adequately monitor the AFWS performance through the Class 1E flow monitoring instrumentation.
- Finally, the inspector reviewed the following logic and piping and instrumentation diagrams for the Unit 2 AFWS, which confirmed that the automatic initiation and flow indications were in accordance with the TMI item requirements:
  - 5S-14-9-Z-40131, No. 2, Revision 9, "Motor Driven AFW Pump Logic Diagram";
  - 5S-14-9-Z-40132, No. 2, Revision 7, "AFW Turbine Steam Inlet Valve Logic Diagram";
  - 5S-14-9-Z-40133, No. 2, Revision 7, "AFW Crossover Valves Logic Diagram";
  - 5S-14-9-Z-40134, No. 2, Revision 6, "AFW Crossover Valve Logic Diagram";
  - 5S-14-9-Z-40135, No. 2, Revision 7, "AFW Pump No. 14 Turbine Trip In Throttle Valve Logic Diagram";
  - 5S-14-9-Z-40136, No. 2, Revision 6, "AFW Turbine Pump Isolation Valve Logic Diagram";
  - 5S-14-9-Z-40139, No. 2, Revision 6, "AWWP Turbin Trip Solenoid Logic Diagram";
  - 5S-14-9-Z-40140, No. 2, Revision 7, "AFW to Steam Generator Regulating Valve Logic Diagram";

5S-14-9-Z-40141, No. 2, Revision 8, "AFW Pumps Isolation Valves Logic Diagram";

5S-14-9-Z-40142, No. 2, Revision 6, "AFW to Steam Generator Regulating Valve Logic Diagram"; and

5S-14-9-F-00024, No. 1, No. 2, "Auxiliary Feedwater Piping and Instrumentation Diagram."

The inspector concluded that the licensee had implemented AFWS automatic initiation and flow indications for Unit 2 that met the guidelines of NUREG-0737. These TMI items are closed for Unit 2.

- q. (Closed) TMI Item II.E.3.1.1: Emergency Power For Pressurizer Heaters/Upgrade Power Supply

This TMI action item requires that the licensee provide a predetermined number of pressurizer heaters with the capability of being powered from either the offsite power source or the emergency power source. These dedicated heaters and associated controls would be used to establish and maintain natural circulation during hot standby conditions when offsite power to the pressurizer heaters was not available.

- o The inspector reviewed STP Plant Electrical Drawings 9-E-PLAA-02 and 9-E-PLAC-02, "Single Line Diagram 480v Class 1E Load Center," which showed that the power supplies for the heater groups were from engineered safety features (ESF) supplies. Heater Groups "A" and "B" were powered from Busses E2A1 and E2C1, respectively. A walkdown of the respective load centers verified that the upgraded pressurizer heaters were powered from the load centers which can be supplied by the emergency diesel generators (EDGs).
- o STP Procedures OPOP05-E0-E000, "Reactor Trip or Safety Injection," and OPOP04-RP-0001, "Loss of Automatic Pressure Control," were reviewed to determine whether the use of the upgraded heaters was referenced. These procedures specifically identified the pressurizer heaters that could be powered from the EDGs and provided guidance on their use.

The licensee has appropriately upgraded the pressurizer heaters to ensure their availability in the event of loss of offsite power. This TMI action item is closed for Unit 2.

- r. (Closed) TMI Item II.E.4.1.2 and II.E.4.1.3: Dedicated Hydrogen Penetrations

These TMI items involved the review of hydrogen control procedures and the specific dedication of containment penetrations for plants using external hydrogen recombiners or purge systems for postaccident combustible gas control.

- STP Unit 2 hydrogen control design utilizes two redundant, 100 percent capacity recombiners located inside the containment. Therefore, the dedicated containment penetrations are not applicable to STP, Unit 2.
- Procedure 2POP02-CG-001, Revision 1, "Electric Hydrogen Recombiners," has been implemented for Unit 2. This procedure addresses the post-LOCA startup, verification of operation, placing the system into standby, and returning the recombiners to pre-LOCA condition.
- The following procedures, which are applicable to both units, contain steps directing the operation of the hydrogen recombiners when hydrogen concentrations within the containment reach specified levels:
  - OPOP05-EO-FRI3, Revision 3, "Response to Voids in Reactor Vessel";
  - OPOP05-EO-FRC1, Revision 9, "Response to Inadequate Core Cooling"; and
  - OPOP05-EO-FRZ1, Revision 0, "Response to High Containment Pressure."

The licensee has completed the required review of procedures to control hydrogen. Procedures and equipment have been installed in the Unit 2 containment to control abnormal hydrogen concentrations. This TMI item is closed for Unit 2.

- s. (Closed) TMI Item II.E.4.2.1-4, II.E.4.2.5.B, II.E.4.2.6, and II.E.4.2.7: Containment Isolation Dependability

These TMI items require that the licensee establish containment isolation dependability by providing improved diverse isolation, minimum containment pressure setpoints for isolation, containment purge valve changes, and closure of purge valves on a high radiation signal.

STP SER and its supplements were reviewed to verify that the conclusions arrived at for Unit 1 containment isolation dependability were also valid for Unit 2. The inspector determined that the SSERs did not modify the previous NRC conclusions such that "the applicant has complied with the provisions regarding diversity in parameters sensed for initiation of containment isolation."

NRC IR 50-498/88-50; 50-499/88-50 documents that the component cooling water (CCW) supply/return to the reactor coolant pump heat exchangers, reactor coolant drain tank heat exchanger, and excess letdown heat exchanger deviated from NUREG-0737, Item II.4.2(3), and Standard Review Plan (SRP) 6.2.4, Section III, for containment

isolation. The licensee corrected this condition during the first refueling outage for Unit 1 in accordance with their commitment. The inspector reviewed the following drawings and verified the above condition was corrected for Unit 2 prior to initial fuel load.

- o 5R209F05019#2, "Component Cooling Water System," Revision 10
- o 5R09F05019#2, "Component Cooling Water System," Revision 11
- o 5R09F05019#2, "Component Cooling Water System," Revision 12

The licensee has installed pneumatic operators on the supplementary purge system supply and exhaust lines. This modification is illustrated on Drawing 5V149V00019#2, "Reactor Containment Building Supplemental Purge System," Revision 11. The inspector reviewed Logic Diagram 5V109-Z-42173, "Containment Supplemental Purge," which shows that the supplemental purge system will isolate on a high radiation signal.

STP Technical Specification (TS) 3.6.1.7 requires that the 48-inch containment purge valves be sealed closed during Modes 1, 2, 3, and 4. The valves are verified closed weekly in accordance with Procedure OPSP03-XC-0007, Revision 0, "Containment Inspection Weekly."

The containment pressure setpoint that initiates a containment isolation is the same for both units. This value has been established in the TS and has been reduced to a value compatible with normal operating conditions.

These TMI items are closed for Unit 2.

t. (Closed) TMI Item II.F.1.2.A: Noble Gas Effluent Monitor

This item requires the installation of noble gas effluent monitors that have extended ranges, such that they are capable of functioning during accident conditions as well as during normal operating conditions.

The licensee had complied with this requirement by installing six noble gas monitors. Two of the six monitors are of the wide-range type, one for the unit vent and one for the condenser vacuum pumps. The remaining four are narrow range types, installed adjacent to the main steam lines.

The inspector verified that this item was closed for Unit 1 in NRC IR 50-498/87-46; 50-499/87-46. The inspector has also confirmed that the Units 1 and 2 designs involving this item are essentially identical. This conclusion was reached following a review of the UFSAR, system drawings, and surveillance/calibration procedures. The inspector also verified that the licensee has an active Unit 2 surveillance program that includes the surveillance requirements relevant to the equipment and instrumentation called for by this

item. Finally, the inspector verified that the surveillance requirements are addressed in TS and that no required surveillance is overdue. The specific surveillance/calibration procedures that were reviewed for applicability to Unit 2 are listed below:

- OPSP14-RA-1006, Revision 0, "Main Steam Line Monitor A (A1RA-RT-8046 or A2RA-RT-8046) Calibration";
- OPSP14-RA-1007, Revision 0, "Main Steam Line Monitor C (A1RA-RT-8048 or A2RA-RT-8048) Calibration";
- OPSP14-RA-1014, Revision 0, "Main Steam Line Monitor B (C1RA-RT-8047 or C2RA-RT-8047) Calibration";
- OPSP14-RA-1015, Revision 0, "Main Steam Line Monitor D (C1RA-RT-8049 or A2RA-RT-8049) Calibration";
- OPSP14-RA-1017, Revision 4, "MAB Unit Vent Wide Range Gas Monitor (N1RA-RT-8010B or N2RA-RT-8010B) Calibration";
- OPSP14-RA-1019, Revision 1, "Condenser Vacuum Pump Wide Range Gas Monitor (N1RA-RT-8027 or N2RA-RT-8027) Calibration";
- 2PSP14-RA-1105, Revision 0, "Radiation Monitors Channel and Source Check Surveillance Procedure";
- OPSP14-RA-1110, Revision 1, "Unit Vent Gaseous Effluent Monitors (N1RA-RT-8010B or N2RA-RT-8010B) Surveillance Procedure"; and
- OPSP14-RA-1111, Revision 1, "Condenser Vacuum Pump Effluent Monitors (N1RA-RT-8027 or N2RA-RT-8027) Surveillance Procedure."

On the basis of the Unit 1 review of this item, and the design and procedures for the instrumentation relevant to this item that are essentially identical, the requirements for this TMI item for Unit 2 have been met. This TMI item is closed for Unit 2.

u. (Closed) TMI Item II.F.1.2.B: Sampling and Analysis of Plant Effluents

This item requires an effluent monitoring capability for radioiodines during an accident condition. This monitoring is to be accomplished by sampling using adsorption on charcoal or other media, followed by onsite laboratory analysis.

The licensee has complied with this requirement by providing an iodine and particulate sampling capability, with onsite analysis of the plant's gaseous effluents during, and following, an accident. Two sampling stations are provided, one for the unit vent and one for the condenser vacuum pumps. Both stations are accessible for postaccident sampling.

The inspector verified that this item was closed for Unit 1 in NRC IR 50-498/89-40; 50-499/89-40. The inspector has also confirmed that the Units 1 and 2 designs involving this item are essentially identical. This conclusion was reached following a review of the UFSAR, system drawings, and surveillance/calibration procedures. Furthermore, the inspector verified that the surveillance requirements are addressed in TS, and that no required surveillance was overdue. The specific surveillance/calibration procedures that were reviewed for applicability to Unit 2 are listed below:

- ° OPSP14-RA-1023, Revision 1, "MAB Unit Vent Particulate and Iodine Monitor (N1RA-RT-8010A or N2RA-RT-8010A) Calibration";
- ° OPSP14-RA-1112, Revision 1, "Unit Vent Particulate and Iodine Effluent Monitors (N1RA-RT-8010A or N2RA-RT-8010A) Surveillance Procedure"; and
- ° 2PSP14-RA-1105, Revision 0, "Radiation Monitors Channel and Source Check Surveillance Procedure."

Because this item has been closed for Unit 1 and the designs and procedures for the instrumentation relevant to this item are essentially identical, the inspector concludes that all requirements for this item have been met. This TMI item is closed for Unit 2.

v. (Closed) TMI Item II.F.1.2.C: Containment High-Range Radiation Monitor

This item requires that at least two radiation level monitors with the capability of monitoring up to 10E8 rad/hour be installed in containment. The monitors are to be designed and qualified to function in an accident environment.

The licensee had complied with this requirement by providing two redundant Class 1E monitors in the containment building, approximately 180 degrees apart. The monitors each have a range from 1 rad/hour to 10E8 rad/hour.

Inspectors previously verified that this item was closed for Unit 1 in NRC IR 50-498/87-35; 50-499/87-35. The inspector confirmed that the Units 1 and 2 designs are essentially identical. The assessment was reached on the basis of the inspector's review of the UFSAR, system drawings, and surveillance/calibration procedures. Furthermore, the inspector verified that the licensee has an active Unit 2 surveillance program that includes the surveillance requirements relevant to the equipment and instrumentation called for by this item. Finally, the inspector verified that the surveillance requirements are addressed in TS, and that no required surveillance is overdue. The specific surveillance/calibration procedures that were reviewed for applicability to Unit 2 are listed below:



- ° P14-RA-1008, Revision 0, "RCB High Range Area Monitor (1RA-RT-8050 or A2RA-RT-8050) Calibration";
- ° OPSP14-RA-1016, Revision 0, "RCB High Range Area Monitor (C1RA-RT-8051 or C2RA-RT-8051) Calibration"; and
- ° 2PSP14-RA-1105, Revision 0, "Radiation Monitors Channel and Source Check Surveillance Procedure."

On the basis of the previous review of this TMI item, and the design and procedures for the instrumentation relevant to this item that are essentially identical to Unit 1, this TMI item is closed for Unit 2.

w. (Closed) TMI Item II.F.1.2.D: Containment Pressure Monitor

This item requires continuous indication of containment pressure in the control room. The range must cover -5 psig to four times the design pressure for steel and three times the design pressure for concrete.

The licensee complied with this requirement by installing two wide-range and four narrow-range containment pressure monitors. Inspectors previously verified that this item was closed for Unit 1 in NRC IR 50-498/87-39; 50-499/87-39. During this inspection, the inspector also confirmed that the Units 1 and 2 designs involving this item are identical. This conclusion was reached following a review of the UFSAR, system drawings, and surveillance/calibration procedures. Furthermore, the inspector verified that the surveillance requirements are addressed in TS, and that no required surveillance was overdue. The specific surveillance/calibration procedures that were reviewed for applicability to Unit 2 are listed below:

- ° 2PSP05-HC-0934, Revision 2, "Containment Pressure Set 4, Calibration (P-0934)";
- ° 2PSP05-HC-0935, Revision 2, "Containment Pressure Set 3, Calibration (P-0935)";
- ° 2PSP05-HC-0936, Revision 2, "Containment Pressure Set 2, Calibration (P-0936)";
- ° 2PSP05-HC-0937, Revision 2, "Containment Pressure Set 1, Calibration (P-0937)";
- ° 2PSP05-HC-9759, Revision 0, "Containment Pressure Extended Range Channel D Calibration (P-9759)"; and
- ° 2PSP05-HC-9760, Revision 0, "Containment Pressure Extended Range Channel C Calibration (P-9760)."

On the basis of the design and procedures for the instrumentation relevant to this item being identical for both units, this TMI item is closed for Unit 2.

x. (Closed) TMI Item II.F.1.2.E: Containment Water Level Monitor

This item requires that continuous indication of containment water level be provided in the control room. A narrow-range indicator is to be provided to cover the range from the bottom to the top of the containment sump. A wide-range monitor is to be provided to cover the range from the bottom of containment to the elevation equivalent to a 600,000-gallon capacity.

The licensee complied with this requirement by installing two narrow-range and three wide-range level monitors. The narrow-range monitors are provided for the normal and secondary sumps. The wide-range monitors are provided to monitor the range that spans from the bottom floor of containment upward.

Inspectors previously verified that this item was closed for Unit 1 in NRC IR 50-498/87-39; 50-499/87-39. During this inspection the inspector also confirmed that the Units 1 and 2 designs involving this item are essentially identical. This conclusion was reached following a review of the UFSAR, system drawings, and surveillance/calibration procedures. Furthermore, the inspector verified that the surveillance requirements are addressed in TS, and that no required surveillance was overdue. The specific surveillance/calibration procedures that were reviewed for applicability to Unit 2 are listed below:

- 6° OPSP05-ED-7839, Revision 0, "Containment Normal Sump Level Channel Calibration (L-7839)";
- ° OPSP05-ED-7840, Revision 0, "Containment Secondary Sump Level Channel Calibration (L-7840)";
- ° 2PSP05-SI-3925, Revision 0, "Containment Wide Range Water Level Calibration (L3925)";
- ° 2PSP05-SI-3926, Revision 0, "Containment Wide Range Water Level Calibration (L-3926)"; and
- ° 2PSP05-SI-3927, Revision 0, "Containment Wide Range Water Level Calibration (L-3927)."

On the basis of the design and procedures for the instrumentation relevant to this item being essentially identical for both units, this TMI item is closed for Unit 2.

y. (Closed) TMI Item II.F.1.2.F: Containment Hydrogen Monitor

This item requires that the capability to continuously monitor and indicate containment atmospheric hydrogen concentration within 30 minutes of the initiation of a safety injection be available in the control room. The instrumentation must be capable of spanning the range of 0 to 10 percent hydrogen.

The licensee complied with this requirement by installing two hydrogen monitors. Continuous indication and recording can be initiated by operators within 30 minutes of the initiation of a safety injection.

Inspectors previously verified that this item was closed for Unit 1 in NRC IR 50-498/87-39; 50-499/87-39. During this inspection, the inspector also confirmed that the Units 1 and 2 designs involving this item are essentially identical. This conclusion was reached following a review of the UFSAR, system drawings, and surveillance/calibration procedures. Furthermore, the inspector verified that the surveillance requirements are addressed in TS, and that no required surveillance was overdue. The specific surveillance/calibration procedures that were reviewed for applicability to Unit 2 are listed below:

- 2PSP05-CM-4102, Revision 0, "Containment Hydrogen Analyzer Calibration (A-4102)"; and
- 2PSP05-CM-4105, Revision 2, "Containment Hydrogen Analyzer Calibration (A-4105)."

On the basis of the design and procedures for the instrumentation relevant to this item being essentially identical for both units, this TMI item is closed for Unit 2.

z. (Closed) TMI Item II.F.2.2 and II.F.2.4: Instrumentation for Detection of Inadequate Core Cooling

These TMI items require the licensee to provide a description of any instrumentation or controls proposed for the plant to supplement existing instrumentation to provide an unambiguous, easily interpreted indication of inadequate core cooling (ICC). In addition, the licensee is required to provide a schedule for installing proposed equipment and a description of the procedures that will be used with the proposed equipment.

The licensee complied with this by installing core exit thermocouples, a core subcooling monitor, and a reactor vessel water level indicating system.

This item was closed for Unit 1 in NRC IR 50-498/87-39; 50-499/87-39. By reviewing the UFSAR, system descriptions, system drawings, and

surveillance/calibration procedures, the inspector verified that the equipment and procedures for Unit 2 are essentially identical to those of Unit 1. The inspector further verified that the surveillance requirements are addressed in the TS. The inspector reviewed the following surveillance/calibration procedures to determine their applicability to Unit 2:

- OPSP05-RC-0051, Revision 0, "Reactor Coolant System Sub-Cooling Monitor Calibration (T-0051)";
- 2PSP05-AM-0050A, Revision 0, "Reactor Vessel Water Level Calibration Train A"; and
- 2PSP05-AM-0050C, Revision 0, "Reactor Vessel Water Level Calibration Train C."

On the basis of the installed instrumentation being essentially identical to that installed in Unit 1, the inspector has concluded that the requirements to provide a schedule for installation and a description of the proposed equipment have been met. These TMI items are closed for Unit 2.

aa. (Closed) TMI Item II.G.1.1: Emergency Power for Pressurizer Equipment

This TMI item requires the power supplies for the pressurizer relief and block valves and the pressurizer level indicators to have the following characteristics:

- Motive and control components of the power operated relief valve (PORV) shall be capable of being supplied from either the offsite power source or the emergency power source when the offsite power is not available.
- Motive and control components associated with the PORV block valves shall be capable of being supplied from either the offsite power source or the emergency power source when the offsite power is not available.
- Motive and control power connection to the emergency busses for the PORVs and their associated block valves shall be through devices that have been qualified in accordance with safety-related requirements.
- The pressurizer level indication instrument channels shall be powered from the vital instrument busses. The busses shall be capable of being supplied from either the offsite or the emergency power source.

The inspector reviewed plant drawings and the UFSAR to verify that the licensee's design complied with the requirements of this item. The following drawings were reviewed:

- 5R149F05003, Revision 1, "Piping and Instrumentation Diagram, RCS Pressurizer";
- 5R149Z41260, Revision 5, "Reactor Coolant Pressurizer Power Relief Valves Logic Diagram, System: RC";
- 5R149Z42155, Revision 6, "Reactor Coolant Pressurizer Relief Isolation Valve Logic Diagram, System: RC";
- 9-E-RC13-01, Revision 4, "Elementary Diagram, Reactor Coolant Pressurizer Power Relief Valves PCV-0655A and PCV-0656A";
- 9-E-DJAA-01, Revision 8, "Single-Line Diagram, 125 VDC Class 1E Distribution SWBD E1A11 (Channel I)";
- 9-E-RC05-01, Revision 4, "Elementary Diagram, Reactor Coolant Pressurizer Relief Isolation MOV0001A and MOV0001B";
- 9-E-VAAA-01 #1, Revision 8, "Single-line Diagram, Vital 120V AC Distribution Panels DP1202, Channel II and III";
- 9-E-VAAB-01 #1, Revision 8, "Single-Line Diagram, Vital 120V AC Distribution Panels DP1202, DP1203, Channel II and III"; and
- 9-E-VAAC-01 #2, Revision 8, "Single-Line Diagram, Vital 120V AC Distribution Panels DP002, DP1204 Channel IV."

The inspector concluded that the Unit 2 PORV and PORV block valves are Class 1E qualified and are capable of being supplied by power from either the offsite power source or the emergency onsite power source. Furthermore, the inspector concluded that the pressurizer level indication instrumentation and its associated busses are Class 1E vital instrument busses. This TMI item is closed for Unit 2.

bb. (Closed) TMI Item III.D.1.1.1: Primary Coolant Outside Containment

This TMI item concerns the review of licensee actions to implement a program to reduce leakage from systems outside the containment, that could potentially contain highly radioactive fluids during a serious transient or accident to as-low-as-practicable levels.

The licensee established a leak reduction program for primary coolant systems outside the containment. This program covers the systems defined in the UFSAR Appendix 7A (7A.III.D.1.2, Amendment 53) and as specified in TS paragraph 6.8.3a. This program became effective for Unit 1 in 1986 and was fully implemented in Unit 2 prior to initial fuel load.

The inspector reviewed the procedures which implemented the leak reduction program. These procedures included:

- OPSP11-SI-0018, Revision 1, "Safety Injection System Train 1C/2C Contaminated System Leakage Test";
- OPSP11-CM-0005, Revision 0, "Containment Monitoring System, Contaminated System Leakage Test";
- OPSP11-AP-0005, Revision 0, "Post-Accident Sampling System, Contaminated System Leakage Test"; and
- OPSP11-CS-0008, Revision 0, "Containment Spray, Contaminated System Leakage Test."

The inspector found that the licensee implemented a program to monitor potentially highly contaminated systems which met the intent of their TMI action item and the requirements of the TS. This TMI item is closed.

- cc. (Closed) TMI Item III.D.3.3.1 and III.D.3.3.2: Provide Means to Detect and Measure Iodine

These TMI items concerned the licensee's programs and equipment to detect the presence of radioiodine and to accurately measure the concentration.

The licensee has implemented a radioiodine monitoring program in accordance with the STP SER paragraph 12.5.2. This program has been implemented through the use of their following procedures:

- OPRP04-ZL-0005, Revision 0, "Radiological Air Sampling Analysis";
- DEPP01-ZA-0005, Revision 6, "Onsite Radiological Controls";
- DEPP01-ZA-0031, Revision 5, "Offsite Emergency Radiological Team";
- OPGP03-ZR-0037, Revision 3, "Radiation Shield Verification Program";
- OPGP03-ZR-0038, Revision 6, "Reactor Shield Verification Program"; and
- OPGP03-ZR-0012, Revision 3, "Radioactive Material Control Program."

The licensee utilizes portable airborne radiation monitors which can detect the presence of radioiodine. The inspector found the licensee's programs and installed airborne radiation monitors to meet the requirements of these TMI items. These TMI items are closed for Unit 2.

dd. (Closed) TMI Item III.D.3.4.3: Control Room Habitability

The licensee installed redundant toxic gas monitors for the Unit 2 control room. The TS require that when a toxic gas monitor is inoperable, that the control room ventilation system be placed into the recirculation mode. The licensee also placed 14 self-contained breathing apparatus in the control room envelope, along with an additional 50, 1-hour air bottles. The licensee has met the requirements of this item. This TMI action item is closed.

ee. (Closed) TMI Item II.K.3.1.B: Testing/Installation of Automatic PORV Isolation System

This item was closed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08. The SER concluded that this feature was not required for STP as noted in Generic Report WCAP-9804 submitted by the Westinghouse Owners Group. Therefore, this TMI item is also closed for Unit 2.

ff. (Closed) TMI Item II.K.3.10: Proposed Anticipatory Trips Modification

This item was closed for Unit 1 in NRC IR 50-498/87-23; 50-499/87-23. STP has an anticipatory reactor trip on turbine trip only at or above a power level of 50 percent. Justification for elimination of this trip below 50 percent power was documented in the STP UFSAR, Appendix 7A. This design was found in compliance with the TMI Action Plan guidelines in the STP SER, Section 7.2.2.4. This TMI item is closed for Unit 2.

gg. (Closed) TMI Item II.K.3.12.B: Confirm Existence of Anticipatory Reactor Trip Upon Turbine Trip Modification

This item was closed for Unit 1 in NRC IR 50-498/87-08; 50-499/87-08. Installation of this modification was confirmed as discussed for TMI Item II.K.3.10 above. This TMI item is closed for Unit 2.

hh. (Closed) TMI Item II.K.3.25.B: Verify Adequacy of Reactor Coolant Pump (RCP) Seals on Loss of AC Power

This item was closed for Unit 1 in NRC IR 50-498/87-23; 50-499/87-23. The RCP seals are adequately cooled by either seal injection flow from the chemical and volume control system (CVCS) or CCW flow to the RCP thermal barrier heat exchangers. The SER accepted this design on the basis that both the charging pumps and CCW pumps are loaded onto the EDGs to restore seal cooling in the event of loss of offsite AC power. The inspector verified that the CCW pumps are powered by the safety-related busses. CCW would be available to the Unit 2 RCPs seals following a loss of offsite power. This TMI item is closed for Unit 2.

ii. (Closed) TMI Item II.K.3.5.B: Automatic Trip of RCPs During LOCA

This item was closed for Unit 1 in NRC IR 50-498/87-23; 50-499/87-23. A low RCS pressure trip for RCPs had been established at 1477 psig. Procedure OPOP05-EO-3010, Revision 0, "Loss of Reactor on Secondary Coolant," required manual trip of RCPs at that pressure, if at least one high head safety injection pump was running. This TMI item is closed for Unit 2.

jj. (Closed) TMI Item II.K.3.9: Proportional Integral Derivative (PID) Controller Modification

This item was closed for Unit 1 in NRC IR 50-498/87-31; 50-499/87-31. The inspector reviewed Westinghouse Electric Corporation Drawing 8820D09, Revision 8, which required a modification to be incorporated for Unit 2. This TMI item is closed for Unit 2.

3. Generic Letter (GL) 88-17 (Loss of Decay Heat Removal) Programmed Enhancements 2515/103

This temporary instruction was developed to assess the licensee's actions to prevent and, if necessary, respond to a loss of decay heat removal during reduced RCS inventory operation.

The inspector performed a walkdown of equipment installed on Unit 2 pursuant to GL 88-17. No deficiencies were identified. The status of these enhancements will be addressed during a future inspection.

4. Exit Interview

The inspectors met with licensee representatives (denoted in paragraph 1) on November 9, 1990. The inspector summarized the scope and findings of the inspection. The licensee did not identify as proprietary any of the information provided to, or reviewed by, the inspectors.