

The Light company

Houston Lighting & Power

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January 17, 1991
ST AE-HL-AE-3667
File No.: G3.12
10CFR2.201

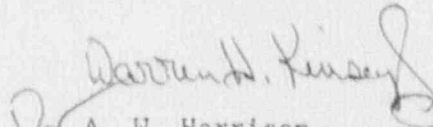
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Deviation 9036-01

Reference (1) NRC Inspection Report 90-36 dated December 17, 1990
(ST-AE-HL-92631)

Houston Lighting & Power Company has reviewed Notice of Deviation
9036-01 dated December 17, 1990 (Reference 1) and submits the attached
response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Mr. S.
D. Phillips at (512) 972-8472 or myself at (512) 972-7298.


A. W. Harrison
Manager,
Nuclear Licensing

SDP/sgs

Attachment: Response to Notice of Deviation
(498/499)9036-01

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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Response to Notice of Deviation 9036-01

I.A. Statement of Deviation

During an NRC inspection conducted November 5-9, 1990, a deviation of your Safety Evaluation Report (SER) was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1990), the deviation is listed below:

Section 13.1.2.2.1 of the STP Updated Final Analysis Report (UFSAR) states "The administrative aide is responsible for tasks of an administrative nature which are required during the shift. The aide performs routine administrative duties and processes such as routing records, logs and correspondence for the control room operations staff as required. The aide reports to the shift supervisor."

Section 13.5.1.1 of the STP SER (NUREG-0781) states, in part, "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."

Contrary to the above, the November 1990 Administrative Aide Shift Scheduling Report for Unit 2, which was signed by the Unit 2 Operations Manager on October 25, 1990, and implemented November 1, 1990, did not provide an administrative aide on the first Saturday shift or for any of the Sunday shifts during the month.

II.A. Response to the Deviation

To comply with TMI-Action I.A.1.2, "Shift Supervisor Responsibilities-Delegate Non-Safety Duties," STP committed in the FSAR to relieve the shift supervisor of administrative burden through delegation of non-safety duties to a control room administrative aide. To implement this commitment, the plant organization was changed by the inclusion of a job description for an Administrative Aide position in the STP plant policy OPGP01-ZA-0001, "Nuclear Plant Organization Policy". The job description did not receive a licensing compliance review or specify that the Administrative Aide was to be available during all shifts.

STP initially employed administrative aides covering each of the Unit 1 shifts, including weekend and back-shift coverage. This coverage was consistent with the SER. Each shift had an administrative aide who relieved the shift supervisor of routine administrative duties. The administrative burden at that time was

quite heavy due to the STP Unit 1 operating licensing process.

As Unit 2 licensing and startup activities began to peak, additional control room aides were employed to handle the work loads for both Units. Once both units had completed startup testing and begun power production, the administrative workload (procedure revisions, plant modifications, etc.) had decreased significantly. The necessity for full shift coverage was evaluated and it was concluded that such coverage was no longer necessary. As a result, coverage was reduced to Monday through Friday, 0600 to 2200 hours.

HL&P has investigated the circumstances through which this organizational change was made without it being reconciled with the STP SER. The organizational change did not receive the same rigorous and formal scrutiny given other facility changes. Consequently the inconsistency with the SER was not identified.

III.A. Corrective Action Taken and Results Achieved

Review of other organizational changes revealed that HL&P had made an organization change concerning the Plant Operations Review Committee (PORC) composition which deleted the position of Plant Superintendent, a position required by Technical Specification (TS) 6.5.1.2. Although a Technical Specification Change Request had been submitted to the NRC, the PORC membership was changed prior to receipt of the NRC - approved amendment. However, PORC meetings remained in compliance with the quorum required by TS 6.5.1.5.

Further review found no other discrepancies with licensing documents.

As an interim corrective measure, a directive has been issued to reinforce the importance of assuring that organizational changes receive appropriate compliance review.

IV.A. Corrective Steps Taken to Prevent Recurrence

The STPEGS commitment tracking practices are thorough and effective. There have been no significant findings of non-compliance which would lead to a concern beyond the organizational changes identified. For further assurance, HL&P will evaluate the review and control of such changes to ensure FSAR/SER commitments are maintained. It is expected that this evaluation will be completed by March 31, 1991. Any measures determined necessary will be scheduled for implementation at that time.

V.A. Date of Full Compliance

HL&P believes that the present coverage meets the intent of TMI-Action I.A.1.2 and the UFSAR and will request NRC concurrence with this change under separate cover.