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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

Request for Deletion of the SER Requirement to

Provide an Administrative Aide on Each Operations Shift Crew

Reference: Letter ST-HL-AE-3667, "Response to Notice of Deviation 9036-01",
from A. W. Harrison to the USNRC Document Control Desk, dated
January 17, 1991

Houston Lighting & Power Company (HL&P) submits this letter to request a revision to the Safety Evaluation Report (SER) (NUREG-0781) for the South Texas Project Electric Generating Station (STPEGS). A change in the STPEGS Control Room Administrative Aide Shift coverage deviates from the description in the SER. The change in shift coverage was evaluated and the requirement to maintain Administrative Aides in the Control Room twenty-four hours a day, seven days a week was eliminated. This change in coverage was previously addressed in the correspondence referenced above.

HL&P has reviewed this change in accordance with 10CFR50.59 and determined that it involves no Unreviewed Safety Questions. The bases for this determination is provided in Attachment 1, and a suggested SER text change is included in Attachment 2.

The STPEGS Plant Operations Review Committee has reviewed and approved the proposed change.

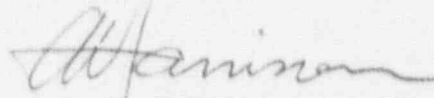
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A Subsidiary of Houston Industries Incorporated

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



A. W. Harrison
Manager,
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SDP/sgs

Attachment: 1) Evaluation for Deletion of the Requirement to Provide an
Administrative Aide on Each Operations Shift Crew.
2) Suggested Change to the SER.

cc:

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Revised 01/29/91

ATTACHMENT 1

EVALUATION FOR DELETION OF THE REQUIREMENT TO PROVIDE
AN ADMINISTRATIVE AID ON EACH OPERATIONS SHIFT CREW

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AN ADMINISTRATIVE AIDE ON EACH OPERATIONS SHIFT CREW

Background

During an NRC inspection of STPEGS Unit 2 conducted November 5-9, 1990, a deviation from Safety Evaluation Report (SER) (NUREG 0781) was identified. TMI-ACTION I.A.1.2 concerns delegation of nonsafety-related duties by the shift supervisor to administrative personnel. HL&P's implementation of this item was previously reviewed and closed for Unit 1 in NRC inspection report (IR) 50-498/87-08; 50-499/87-08. HL&P had appropriately identified the duties which the shift supervisor may delegate to the Administrative Aide. The position description for Administrative Aide(s) is the same as previously reviewed by the NRC for Unit 1. However, during the Unit 2 inspection the inspector noted that HL&P had revised the times when the Administrative Aide would be on duty. There was no assigned Administrative Aide coverage from day shift Saturday through Monday, 6 a.m. Also, Administrative Aides were not assigned between the hours of 11:00 p.m. and 6:00 a.m. This partial coverage appears to deviate from the Safety Evaluation Report (SER), Section 13.5.1.1. However, HL&P has evaluated the deviation pursuant to 10CFR50.59 and determined that the change involves no unreviewed safety question; that the change is acceptable and that the change meets the intent of TMI-ACTION I.A.1.2.

STPEGS 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 STPEGS Unit 1 licensing and startup activities.

As Unit 2 licensing and startup activities began to peak, additional Control Room Administrative Aides were employed to handle the work loads for both Units. Once both Units had completed startup testing and begun power operation, the administrative workload decreased significantly.

- Procedure revisions, plant modifications, field change request (FCR's), etc. decreased significantly.
- Priority routing of startup procedure changes reduced significantly.
- Startup test result packages which had to be routed and filed greatly reduced.
- Locations for controlled copy procedures were established outside of the Control Room thereby reducing the burden of Administrative Aides updating procedure manuals.

Background (cont'd)

- Control Room computer printout routings were shifted to day shift, Monday through Friday.
- The Daily Status Report could be inputted after 6:00 a.m. and accommodated by a 6:00 a.m. to 2:00 p.m. Administrative Aide Shift.

The necessity for full shift coverage was evaluated and such coverage was concluded to be no longer necessary. As a result, coverage was reduced to Monday through Friday, 6:00 a.m. to 11:00 p.m. This change was made without it being reconciled with the STPEGS SER.

Proposed Change

HL&P requests that the NRC revise the SER to eliminate the requirement to maintain Administrative Aid coverage in the Control Room twenty-four hours a day, seven days a week. A suggested change to SER Section 13.5.1.1 is provided in Attachment 2.

Safety Evaluation

The purpose of the TMI-ACTION I.A.1.2 is to increase the shift supervisor's attention to his command function by minimizing ancillary responsibilities. Administrative functions that detract from or are subordinate to the management responsibility for assuring the safe operation of the plant are to be delegated to other operations personnel not on duty in the control room.

The Administrative Aide is responsible for tasks of an administrative nature during his shift. The Administrative Aide performs routine administrative duties which allows the Shift Supervisor to focus on more important duties. These duties include processing and routing records, logs, and correspondence as required. This position reports to the Shift Supervisor on the shift. Therefore, Administrative Aide(s) relieve the Shift Supervisor of administrative duties as required, but are not necessarily scheduled on each operations shift crew as stated in the SER.

Safety Evaluation (cont'd)

The basis for the schedular change described above is a plant specific evaluation pursuant to 10CFR50.59. The evaluation determined the following:

- 1) The proposed change to the SER does not involve a significant increase in the probability or consequences of any accident previously evaluated.

The removal of the "each shift" requirement from the SER has no influence or impact on the probability or consequences of any accident previously evaluated. The volume of administrative duties has decreased to a level that does not warrant an Administrative Aide on each shift. The change is administrative in nature.

- 2) The proposed change to the SER does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This change is administrative in nature and involves no change to the design bases or operating procedures. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) The proposed change to the SER does not result in a significant reduction in the margin of safety as defined in the basis for any technical specification.

The proposed change is administrative in nature and does not impact the operation of STPEGS in a manner that involves a reduction in the margin of safety as defined in the basis for any technical specification.

Conclusion

Removal of the "each shift" requirement from the SER has no impact on plant operations or safety. No safety-related equipment, safety function, or plant operation is altered as a result of this change, and the present STPEGS Administrative Aide shift coverage meets the intent of TMI-ACTION I.A.1.2.

ATTACHMENT 2

SUGGESTED CHANGE TO THE SER

of operating activities, crane operations, and conduct of the initial test program. Each of these items is discussed below.

13.5.1.1 Shift Supervisor Responsibilities

Each operating shift will have a designated shift supervisor who is a licensed senior operator. Each shift supervisor has the responsibility of directing the licensed activities of licensed operators on the supervisor's shift, pursuant to 10 CFR 50.54(1). It is the staff's position that a management directive to this effect, signed by the Vice President--Nuclear Plant Operations, must be reissued to all station personnel on an annual basis.

The applicant's procedures will define the authority and responsibility of each member of the operating shift crew, pursuant to Section 5.2 of ANSI/ANS 3.2-1982. *The applicant* 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 applicant's plans for the organization and conduct of the operating shift crews meet 10 CFR 50.54 and NUREG-0694 Item I.C.3.

13.5.1.2 Control Room Access

The applicant will have a procedure to limit normal access to the control room to individuals responsible for direct operation of the plant, technical advisors, and specified NRC personnel. The procedure must establish a clear line of authority, responsibility, and succession in the control room. The shift supervisor is responsible for controlling access to the control room and may approve special access for good cause. In the absence of the shift supervisor, the unit supervisor (an SRO) should control access to the control room. The applicant has committed to limit access to the control room to meet NUREG-0694 Item I.C.4.

13.5.1.3 Limits on Working Hours

The applicant will establish a policy governing the working hours of plant personnel who perform safety-related functions. The policy should apply to SROs, ROs, health physicists, auxiliary operators, and key maintenance personnel. The purpose of the policy is to preclude the routine use of overtime; however, overtime beyond the set limits is allowed on a case-by-case basis, if authorized by the Plant Manager, the manager's deputy, or higher levels of management. The applicant has committed to limit working hours to meet NUREG-0737 Item I.A.1.3, as clarified by Generic Letter 82-12.

13.5.1.4 Shift Relief/Turnover Requirements

The applicant will prepare and implement a procedure for use during shift relief or shift turnover. The procedure must prescribe the use of checklists and logs to ensure that the operating staff, including auxiliary operators and maintenance personnel, is aware of critical plant parameters and the status of plant systems. The applicant has committed to meet the shift relief and turnover requirements of NUREG-0694 Item I.C.2.

13.5.1.5 Operating Experience Feedback

An organizational unit must be assigned to screen operating information from both inside and outside the South Texas Project organization. Information that