

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

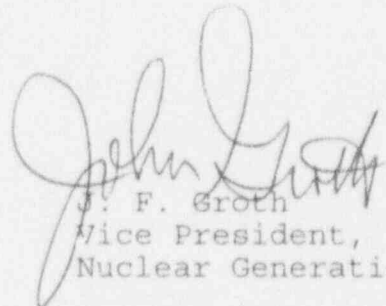
July 14, 1994
ST-HL-AE-4833
File No.: G02.04
10CFR50

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

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498 & 50-499
Response to NRC Inspection Report 94-18
Regarding Security Force Overtime

Houston Lighting & Power has reviewed NRC Inspection Report 94-18, dated June 14, 1994, regarding security force overtime, and submits the requested information in the attachment to this letter.

If there are any questions, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8664.


J. F. Groth
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Nuclear Generation

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Attachment

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Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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NRC Inspection Report 50-498/94-18; 50-499/94-18

Based on the results of the current inspection, excessive overtime continues to be a problem. Accordingly, we request that you respond in writing within 30 days of the date of this letter with your evaluation of the overtime issue. Your response should address the number of overtime hours security officers are allowed to work per week.

Houston Lighting & Power Response

In 1993, Houston Lighting & Power implemented actions focused on reducing security force overtime. Overtime levels, for the security force as a whole, were reduced to 12-14% in late 1993, but returned to 17-19% in early 1994 when annual requalification was conducted. Houston Lighting & Power determined that these overtime levels, which were higher than desired, were caused because the security contractor had not hired sufficient numbers of personnel to fill vacancies.

Houston Lighting & Power also noticed that individual security force personnel, at times, had voluntarily worked levels of overtime that considerably exceeded the average of the security force. Houston Lighting & Power determined that individuals were able to work excessive levels of overtime because adequate administrative controls did not exist.

Houston Lighting & Power has implemented or is implementing measures to reduce the overtime levels for the security force as a whole and to preclude further instances of excessive voluntary overtime by individuals. These measures include:

1. The shift rotation has been returned to four shifts from five shifts to increase the number of personnel per shift. This increase in shift staffing has reduced overtime by providing extra personnel for unanticipated compensatory measures, vacations, training, sickness, and other absences.
2. Additional security force personnel have been hired and placed in training classes. Two classes have been completed and a third is in training. When the third class is completed in late August, the number of trained personnel will exceed a targeted staffing level of forty-five per shift.
3. Additional personnel have been trained for the Security Force Supervisor position because relatively few absences at this position can create higher than desired security force overtime levels. Currently, at least one additional person has been trained for each shift.

4. The normal security force work schedule has been established as seven twelve-hour days over a two week period (four twelve-hour days one week and three twelve-hour days the following week) for a total of eighty-four hours in a two week period. Adding in the fifteen minutes required for shift turnover results in just under eighty-six hours every two weeks or approximately 7% overtime.
5. A security force overtime policy has been established that allows personnel to work up to sixty hours (excluding shift turnover time) per week with the approval of security contractor management. Working more than sixty hours (excluding shift turnover time) in a week requires the approval of the Houston Lighting & Power Director of Nuclear Security.
6. Each day, the posting of security force personnel is evaluated and adjustments are made to address unanticipated requirements. These adjustments reduce the need to call in additional security force personnel on overtime.
7. Security management monitors overtime daily. If personnel who are working overtime are not essential for shift manning, they are being sent home.
8. The East Gate vehicle access portal is being closed on nights and weekends to free up additional security force personnel. However, there is adequate shift manning to open the portal on nights and weekends, if required.
9. Repairs of degraded security system equipment are being actively pursued, and in the interim, the increased shift staffing levels provide dedicated personnel for compensatory actions without significantly affecting overtime levels.

Houston Lighting & Power's ultimate goal in implementing these measures is to maintain security force overtime at less than 10% and individual overtime at reasonable levels. For the month of June, overtime was 11%, which is the lowest overtime percentage in over a year. The overtime levels for July and August are projected to be less than 10%. Based on these projections, Houston Lighting & Power believes that continuing management attention on the measures described above will reduce overtime levels while allowing flexibility to authorize higher overtime levels when warranted by the situation.

It should be noted that the Houston Lighting & Power observations regarding overall and individual overtime levels were self-identified in March 1994. These observations, as well as many of the measures in progress or planned, were discussed with the inspector in May 1994.