

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION INDEPENDENT SAFETY ENGINEERING GROUP ORGANIZATION AND RESPONSIBILITIES	NUMBER ISEG-01	REV. NO. 5
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Approval: S M Hall  
Manager, Nuclear Licensing

Date: 6/28/92

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Director, ISEG

Date: 6-28-93



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#### 1.0 PURPOSE

This procedure describes the structure, functions, and general responsibilities of the STPEGS Independent Safety Engineering Group (ISEG).

#### 2.0 SCOPE

This procedure applies to the STPEGS ISEG.

#### 3.0 DEFINITIONS

None.

#### 4.0 REFERENCES

- 4.1 STPEGS Final Safety Analysis Report Section 13.4.2.2.
- 4.2 STPEGS Technical Specifications Section 6.2.3.
- 4.3 NUREG 0737, Clarification of TMI Action Plan Requirements (November 1980), Item I.B.1.2.
- 4.4 OPL-4422: W. J. Jump memorandum, "Independent Safety Engineering Group."
- 4.5 IP-1.49, Independent Safety Engineering Group (ISEG) Reports and Responses.

#### 5.0 RESPONSIBILITIES

##### 5.1 The Director, ISEG is responsible for:

- 5.1.1 Ensuring that regulatory requirements and other commitments associated with ISEG are identified and implemented.
- 5.1.2 Ensuring that ISEG actively pursues the objectives described in this procedure while complying with requirements and commitments.
- 5.1.3 Coordinating and supervising the activities of ISEG.

##### 5.2 ISEG personnel are responsible for complying with applicable ISEG procedural requirements, performing assigned tasks and collateral duties, and achieving the intentions expressed in this procedure.

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## 6.0 REQUIREMENTS

### 6.1 Organization and Staffing

#### 6.1.1 Organization

6.1.1.1 A generic ISEG Organization Chart is shown in Exhibit ISEG-01-A.

6.1.1.2 The Director, ISEG reports directly to the Manager, Nuclear Licensing.

6.1.1.3 ISEG staff reports directly to the Director, ISEG.

#### 6.1.2 Minimum Staff Complement

6.1.2.1 The ISEG technical staff includes at least five full-time individuals assigned to the STPEGS Plant Site.

6.1.2.2 The Director, ISEG may be counted in the minimum staff complement, if qualified, for compliance with that requirement.

#### 6.1.3 Staff Qualifications

6.1.3.1 Individuals counted for the minimum staff complement requirement have a bachelors degree in engineering (or related science), and four or more years of professional level experience, at least two years of which is in the nuclear power industry. These individuals are familiar with nuclear plant operations, maintenance, or support activities. Additional personnel not having these specific qualifications may also be assigned to ISEG.

#### 6.1.4 ISEG Staffing

6.1.4.1 Personnel assigned to the ISEG acquire skill in performing observations and reviews of operating and support activities as well as in-depth activity effectiveness assessments and investigations. Temporary assignments of external departmental personnel beyond the permanent ISEG staff is allowed to augment ISEG staffing and to develop the skills of the temporary personnel.

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6.1.4.3 The Human Resource Development Program may be used as a vehicle to select qualified candidates for ISEG positions. Additionally, the Company Wide Posting System may be used to ensure interested qualified personnel are given consideration for available ISEG positions.

6.1.4.4 ISEG avoids reliance on contract personnel to satisfy the minimum staff requirement or for assistance other than for short term one time projects.

## 6.2 Function and Policy

### 6.2.1 Function

6.2.1.1 The function of ISEG is to independently observe and review selected plant activities in order to provide senior management with additional insight as to where improvements can and should be made to procedures, equipment, and training to improve plant safety and reliability.

6.2.1.2 Functional objectives are achieved through the following actions:

6.2.1.2.1 Observation of operations, maintenance and support activities. Reviews of documentation associated with these activities.

6.2.1.2.2 Administration of the Operating Experience Review (OER) Program per approved procedures.

6.2.1.2.3 Performance of in-depth assessments of how specific activities are (or have been) performed or of the physical condition of Plant systems/structures.

6.2.1.2.4 Investigation of selected plant incidents.

6.2.1.2.5 Assignments by the Nuclear Safety Review Board (NSRB) such as reviews of Licensee Event Reports, significant industry events, etc.

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6.2.1.2.6 Assessments or investigations as requested by others as resources permit.

#### 6.2.2 Policy

6.2.2.1 In order to maintain an accurate understanding of how activities are being performed, a priority is given to viewing activities in progress and the day-to-day physical condition of the Plant. Documentation review alone does not provide an adequate picture of how appropriate and complete the activity planning and preparation was, how accurately and completely the activity was documented, or how appropriately and effectively problems encountered were dealt with.

6.2.2.2 ISEG is aware of the opportunity they have to provide senior management with an objective understanding of how well the STPEGS is operating. ISEG must maintain the highest professional standards and provide clear and concise information both to senior management and to the individual Plant departments.

6.2.2.3 ISEG communications (including reports) with other organizations utilize functional titles instead of identifying individuals by name when describing activities or events.

6.2.2.4 ISEG focus is on how activities are performed in general rather than in any one particular occurrence.

6.2.2.5 ISEG focus is on how effectively the objectives of an activity are met rather than on procedural compliance or achievement of minimum required results/performance alone.

6.2.2.6 ISEG maintains the independence and objectivity necessary to effectively focus on where improvements to Plant safety and reliability should be made. ISEG personnel shall have no production or audit signoff responsibility.

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- 6.2.2.7 Whenever conditions appear to present a potentially significant adverse Plant safety and reliability concern, ISEG personnel are to immediately inform the responsible organization management, the Director, ISEG, and the Task Lead (if applicable). Such conditions include those that may involve entry into a Plant Technical Specification action statement, or may involve showing the Plant to be in a condition outside the bounding assumptions of safety analyses, or may present an immediate and significant industrial safety hazard, or which may otherwise present an unjustifiable risk to Plant reliability.
- 6.2.2.8 When an observed situation warrants a Station Problem Report (SPR) be written, the ISEG engineer is responsible to ensure it is submitted. This can be accomplished by either submittal by ISEG or by personal verification that others involved in the activity have submitted the SPR.
- 6.2.2.9 ISEG personnel are to warn individuals observed to be in immediate risk from a significant industrial safety hazard.
- 6.3 Relationship with Nuclear Safety Review Board (NSRB)
- 6.3.1 ISEG maintains a close relationship with the NSRB. This relationship is required by the Technical Specifications and is accomplished via the following processes.
- 6.3.1.1 The Chairman is provided copies of ISEG final reports upon issuance.
- 6.3.1.2 ISEG provides a monthly report to the Chairman, NSRB on current initiatives and activities.
- 6.3.1.3 ISEG procedures are reviewed, prior to issue, by the Chairman, NSRB.
- 6.3.1.4 ISEG performs Tasks as requested by the NSRB subject to resource availability and Task priorities.

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6.3.1.5 ISEG provides requested presentations to the NSRB. Presentations may be case studies, ISEG reports, results of reviews, etc.

6.3.1.6 NSRB provides a forum for review and resolution of ISEG issues when appropriate.

## 7.0 DOCUMENTATION

None.

## 8.0 EXHIBITS

8.1 Exhibit ISEG-01-A - Independent Safety Engineering Group (ISEG) Organization Chart.

