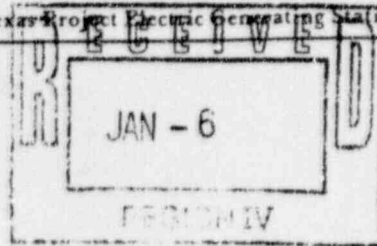


# The Light company

Houston Lighting & Power

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



December 31, 1993  
ST-HL-AE-100004  
File No.: G36  
10CFR50

Mr. James M. Taylor  
Executive Director for Operations  
United States Nuclear Regulatory Commission  
80 F Street, N.W.  
Washington, D.C. 20001

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498; STN 50-499  
South Texas Project Operational Readiness Plan Clarification

Reference: Correspondence from William T. Cottle (HL&P) to James  
M. Taylor (NRC), dated August 28, 1993 (ST-HL-AE-4556)

Dear Mr. Taylor:

On August 28, 1993 Houston Lighting & Power (HL&P) submitted the Operational Readiness Plan (ORP) for the South Texas Project. Since then there has been significant progress on achieving the goals set forth in that plan. Implementation of the ORP, as with most plans, has identified refinements and items requiring clarification. These changes, summarized below, will be incorporated into Revision 1 of the Operational Readiness Plan. This revision will be developed to support the return of Unit 2 to power operation. In order to incorporate lessons learned from Unit 1, it will be submitted 45 days after Unit 1 attains the 100% power assessment plateau.

## Technical Training

- Excerpt from Operational Readiness Plan, Revision 0, Page 24

Two additional personnel weaknesses identified during the evaluation of technical training were a less than adequate understanding of plant systems and an insufficient number of certified journeyman to accomplish routine tasks. To address both needs, an aggressive training schedule to be completed by the end of December 1993 has been implemented.

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IR\93-365.001

Project Manager on Behalf of the Participants in the South Texas Project

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PDR FOIA  
COPELAN95-219 PDR

- Clarification

STP's 1993 goal associated with certification has been achieved. This required 658 (173 electrical, 260 mechanical, 225 Instrumentation and Control) certifications to be achieved. Also, 81 incumbent journeyman needing system training have completed that instruction. This ORP action is complete.

### Supervisory Training

- Excerpt from Operational Readiness Plan, Revision 0, Page 24

To address weaknesses in performance of Maintenance Supervisors, a supervisor training program has been developed to ensure full compliance with ACAD 90-10, "Guidelines for Maintenance Supervisor Selection and Development." Training using this program has been completed for Mechanical Supervisors and is scheduled to be complete for Electrical and I&C Supervisors by the end of 1993.

- Clarification

Training has been accomplished for those Mechanical, Electrical and Instrumentation and Control Supervisors (directly supervising craft activities), incumbent to their positions prior to the reorganization of the maintenance department to support unitization. Training of new supervisors is scheduled for completion during 1994. Only supervisors that directly supervise craft activities are included in this training.

### Performance Measures Used to Monitor Maintenance Effectiveness

- Excerpt from Operational Readiness Plan, Revision 0, Page 25

Indicators to be used to monitor station material condition are (only two of seven listed):

- Main Control Board deficiencies. (Goal: less than 10)
- PM deferral rate. (Goal: less than 20)

- Clarification

- Main Control Board Deficiencies

The goal set for this category is currently less than 10 prior to power operation. However, it should be recognized that some MCB deficiencies will be "work complete" but not in-service because post-maintenance/operability tests require at power conditions. Also, because of the length of time the unit has been shutdown with instruments out of service, it is anticipated that as mode changes occur the number of deficiencies will temporarily rise above 10. Therefore, the goal is being restated as follows:

No outstanding deficiencies that adversely effect Operations ability to effectively monitor plant conditions at each mode; with a goal of < 10 at the 100% power assessment plateau.

- Preventive Maintenance Deferral Rate

Although the goal of less than 20 PM deferrals has been achieved, further evaluation has indicated that a fixed number is not an effective nor practical indicator for long term success. The new goal, consistent with the STP Business Plan, is to achieve and maintain a PM Deferral Rate of < 5%.

### Equipment Labeling

- Excerpt from Operational Readiness Plan, Revision 0, Page 35

A comprehensive relabeling program incorporating the guidelines of INPO Good Practice OP-28, "System and Component Labeling" and EPRI NP-6209, "Effective Plant Labeling and Coding" is being implemented. ... Program requirements will be in-place and a pilot program involving the Standby Diesel Generators will be completed by the end of 1993.

- Clarification

The pilot program involving the Standby Diesel Generator is limited to mechanical components and instrumentation for the engine. The electrical portion of the Standby Diesel Generator relabeling effort will be in conjunction with the plant electrical distribution systems. Support systems, such as the air start system, also are not included in the initial program.

### Preventive Maintenance Program

- Excerpt from Operational Readiness Plan, Revision 0, Page 35

A Business Plan strategy has been developed to address plant reliability improvements. The strategy will assess the existing Preventive Maintenance and Reliability Centered Maintenance (RCM) programs to foster the development of a comprehensive reliability-based, predictive/preventive maintenance program with a documented basis. The strategy will also provide for the review of all existing PMs to ensure they are applicable and effective, and an evaluation of the PM program process, including software, to identify elements that require enhancement. This effort will be accomplished through an integrated approach composed of the performance of detailed EPRI style RCM on approximately 10 systems, streamlined RCM on approximately 40 systems, and a comprehensive review of PM tasks to develop a complete PM basis.

- Clarification

The description of the Reliability Centered Maintenance (RCM) program provided in the ORP was based upon the draft plan submitted for the STP Business Plan. At the time the ORP was submitted, the business planning process was ongoing. As a result of discussions during this process and input from other utilities that utilized the in-depth RCM process, it was determined that more benefit would be gained by STP by changing the original proposal from: "... the performance of detailed EPRI style RCM on approximately 10 systems, streamlined RCM on approximately 40 systems, and a comprehensive review of PM tasks to develop a complete PM basis." to "... the performance of detailed EPRI style RCM on three systems, streamlined RCM on the 47 remaining systems, and a comprehensive review of PM tasks to develop a complete PM basis."

### Assessment Process

The assessment schedule, as described on page 14 of the ORP, calls for an assessment milestone after one week of full power operation. After further consideration, it was decided that an assessment after 10 days of full power operation would provide more meaningful information. Therefore, as a minimum, formal assessments will be conducted prior to Mode 4, prior to criticality, prior to power ascension above 50% power, and after 10 days of full power operation.

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

ST-HL-AE-100004  
File No.: G36  
Page 5 of 6

As STP nears resumption of power operation, it may become necessary to refine other goals presented in the Operational Readiness Plan. If this is necessary, the NRC will be promptly notified.

If you have any questions or comments, please contact Mr. J. J. Sheppard at (512) 972-8757

*W T Cottle*

W. T. Cottle  
Group Vice President  
Nuclear



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

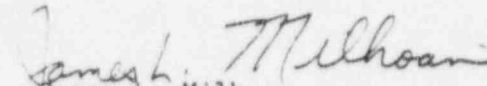
JAN 12 1994

MEMORANDUM FOR: James M. Taylor, Executive Director for Operations  
FROM: James L. Milhoan, Regional Administrator, Region IV  
SUBJECT: STATUS SUMMARY OF REGION IV STAFF ACTIONS RESULTING FROM THE  
DIAGNOSTIC EVALUATION AT THE SOUTH TEXAS PROJECT

In response to your memorandum of August 3, 1993, I am providing the attached status summary of Region IV staff actions resulting from the Diagnostic Evaluation at the South Texas Project. This summary updates my memorandum of November 2, 1993, and reports completion of the staff actions assigned to Region IV.

To coordinate the NRC activities prior to authorization of unit restart, the South Texas Project Restart Panel is continuing to work under the guidance of Manual Chapter 0350 using a plant-specific Restart Action Plan.

If there are any questions regarding the Restart Action Plan or the staff action items, please contact me or have your staff contact Bill Johnson (817)860-8148.

  
James L. Milhoan  
Regional Administrator

Attachment:  
Status Summary of Regional Staff Actions

F/7

~~903040237~~

JAN 12 1994

cc w/Attachment:

- E. Jordan AEOD (MS 3701)
- S. Rubin, AEOD (MS 5219)
- T. Murley, NRR (MS 12G18)
- J. Callan, NRR (MS 12G19)
- S. Collins, RIV
- A. B. Beach, RIV
- J. Roe, NRR (MS 13E4)
- E. Adensam, NRR (MS 4E4)
- W. Russell, NRR (MS 12G18)
- W. Johnson, RIV
- S. Black, NRR (MS 13H15)
- L. Kokajko, NRR (MS 13E16)
- E. Imbro, NRR (MS 9A1)

AI 93-238E

RIV:C:DRP/A <i>g</i>	DD:DRP <i>my</i>	D:DRP <i>h</i>	D:DRS <i>h</i>	DRP <i>h</i>
WDJohnson:lt	TPGwynn	ABBeach	SJCollins	JMMontgomery
01/03/94	01/6/94	01/6/94	01/6/94	01/7/94

RA				
JLMilhoan				
01/ /94				

## ATTACHMENT 1

### Status Summary of Regional Staff Actions

- Staff Action 1.(a): Assess operating staff workload issues at STP and the management actions to resolve them.
- Status: This restart issue has been resolved. The licensee's Operational Readiness Plan addressed several initiatives to increase staffing and to reduce the administrative workload of the operators. The Region IV inspection in this area was performed in two segments. The first segment was conducted the week of November 1, 1993, and the second segment was conducted the week of November 29, 1993. NRC Inspection Reports 50-498/93-40; 50-499/93-40 and 50-498/93-41; 50-499/93-41 were issued on December 1 and December 16, 1993, respectively. The first inspection found that the licensee had made substantial progress toward resolving the restart issue. The second inspection focused on implementation effectiveness. This inspection found that the licensee's corrective actions have been effective in correcting the problems of marginal operator staffing. These actions included relieving the operating crew of administrative burdens by transferring duties to the newly formed operations work control group; adding a sixth crew of operators which will begin watch rotation in January 1994; training 20 additional non-licensed operators and placing additional non-licensed operators on each crew; transferring certain duties from the operations department to the technical services department, and providing engineering support to operations and maintenance around the clock. Open followup items involve NRC evaluation of the implementation of the 6-shift watch rotation in January 1994.
- Staff Action 3: Conduct a followup inspection of the fire protection deficiencies at STP.
- Status: The following two restart issues have been resolved: 1) Adequacy of fire brigade leader training and qualifications, and 2) Adequacy of the fire protection computers and software, the licensee's success in reducing the number of spurious fire protection system alarms, and other fire protection hardware problems. The first segment of the Region IV inspection of these issues was conducted during the week of October 18, 1993. Results of this inspection (Inspection Report 50-498/93-37; 50-499/93-37 issued on November 23, 1993) were favorable, indicating considerable progress. A followup inspection was



conducted the week of December 13, 1993. Results of the inspections are summarized below.

1. Fire Brigade Team Leader Training

The concerns of the fire brigade leaders' knowledge of facility safe shutdown systems, and the impact on the operations staff has been reviewed by Region IV staff. The region concluded that the current fire brigade leader training program meets the regulatory requirements of Appendix R to 10 CFR 50 regarding the STP fire brigade leaders' knowledge of safe shutdown systems. The licensee's effort to validate the current program learning objectives by a comparison review against the licensed operator training program was effective. Upon completion of the design and implementation of a new training program that is being developed, the licensee's training program will far exceed industry standards. The licensee's current effort to provide extra personnel, by training six additional personnel qualified to perform as fire brigade leader, will remove all burden from plant operations personnel, to staff the position of fire brigade leader.

2. Fire Protection Computer Alarm System

Regional personnel determined that the licensee's efforts to significantly reduce the distraction of control room operators by the fire protection computer alarm system had been successful. The number of spurious alarms noted during the DET was characterized as 20-30 per day. During the followup inspection, inspectors observed 4-5 alarms per day. All alarms were being trended to identify additional problems with additional computer alarm points. There was indication that information retrieval had been improved due to the improved computer alarm descriptions. There was an apparent increase in operator sensitivity to the information provided by the fire detection system and control room operators appeared to be less distracted. The conclusion was reached that the performance of the fire detection and computer system had been significantly enhanced by the numerous hardware and software changes. Startup of Unit 1 should not be delayed because of this issue. The licensee will need to address the Unit 2 fire protection computer alarm system separately.

### 3. Fire Protection Systems Service Request Backlog

Region IV inspectors concluded that the licensee had identified all the work necessary to address the material condition of the fire detection and suppression systems. A determination of work progress and quality was made during the followup inspection to assess the improved condition of the fire protection systems. This inspection found that STP management had performed effectively in addressing the degraded material condition of the Unit 1 and common fire protection systems. The licensee's process had identified a significant number of new hardware deficiencies, which were being worked to completion. A significant portion of the work (80-85 percent) had been completed and the remaining items were being completed at a higher rate than originally expected. The region concluded that the status of the Unit 1 and common fire protection systems maintenance and repair backlog should not be an issue affecting the scheduled startup of Unit 1.

### 4. Control of Transient Combustibles

The inspection results showed that the licensee had increased emphasis on control of transient combustible material. This effort in conjunction with the licensee's existing administrative procedures was providing a more effective program. During plant tours, the inspectors found that the plant was generally clean and that outage work areas were well policed. The transient combustibles observed were within the combustible loading for the areas. Continued effectiveness of the transient combustible control program will require close control and involvement by licensee management with specific emphasis on generating a sense of individual responsibility by all employees. The control of transient combustibles should not impact the scheduled startup of either unit.

### 5. Degraded Fire Barrier Penetration Seals

The inspection results indicated that the licensee had taken appropriate and timely corrective action for the shrinking and cracking of the hydrosil fire barrier penetration seals. The bulk of this action involved creating, testing, and implementing a valid repair process. Since the penetration seal desiccation process was time dependent, the failures extended over

a long period and show a rapid decrease in failure rate, from 27 percent in 1990 to 6.1 percent in 1991 and 3.9 percent in 1993. Regional inspectors agree with the licensee's opinion that the most significant seal degradation has already taken place. Further degradation should be very limited, and will be repaired on a case by case basis, when identified within the normal surveillance program. There was no evidence that the evaluation, investigation, and repair processes were unduly delayed. It appears that management was well aware of the problem and supported the recovery efforts.

Staff Action 8:

Review and evaluate the licensee's response to the diagnostic evaluation report for completeness. Prepare an appropriate reply for EDO signature.

Status:

This item was completed with the issuance of the EDO letter to the licensee on November 18, 1993.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAR - 3 1994

MEMORANDUM FOR: L. J. Callan  
Regional Administrator

FROM: Samuel J. Collins  
South Texas Project Restart Panel

SUBJECT: COMPLETION OF SOUTH TEXAS PROJECT UNIT 1 CONFIRMATORY ACTION  
LETTER ITEMS AND RESTART ACTION PLAN STATUS

The purpose of this memorandum is to document the discussions and presentation to you on February 15, 1994, which informed you of the status of Houston Lighting & Power Company's (HL&P) actions to implement the South Texas Project (STP) Confirmatory Action Letter (CAL 4-93-04B) dated October 15, 1993, and the status of tasks associated with the STP Restart Action Plan for Unit 1.

Confirmatory Action Letter

On February 3, 1993, following a reactor trip, the Unit 2 turbine-driven auxiliary feedwater pump started and immediately tripped on overspeed. On February 4, 1993, Unit 1 was required to shut down as a result of repeated failures of the turbine-driven auxiliary feedwater pump to start on demand and operate without tripping on overspeed. As a result of these problems, NRC issued a Confirmatory Action Letter (CAL) to HL&P on February 5, 1993, and dispatched an augmented inspection team (AIT). The CAL required resolution of the overspeed trip condition affecting the turbine-driven auxiliary feedwater pumps and a briefing of NRC staff prior to restart of the unit.

In addition to the AIT activities, several special inspections were conducted at STP, including a diagnostic evaluation by the NRC office of Analysis and Evaluation of Operational Data conducted during the period of March 29 to April 30, 1993. The findings of these reviews resulted in supplements to the CAL issued on May 7, 1993 (CAL 4-93-04), and October 15, 1993 (CAL 4-93-04B). These supplements included issues that NRC considered of sufficient scope and safety significance to require resolution prior to either unit being restarted (Enclosures 1, 2, and 3).

Licensee Actions

In addition to the hardware related issues at STP, the NRC required HL&P to address programmatic problems, including work backlogs, postmaintenance testing shortcomings, outstanding modifications, operations staffing adequacy, fire protection equipment and training, management effectiveness in identifying, pursuing, and correcting plant problems, and the results of internal restart readiness reviews. In response, the licensee developed the

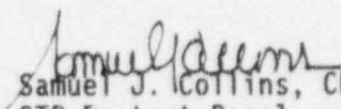
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Based on the independent inspections and reviews conducted by the NRC staff and described in Enclosure 4 (STP Restart Action Plan), the licensee has satisfactorily completed the items specified in the CAL.

Restart Panel Meeting

The STP Restart Panel met on February 15, 1994, in accordance with NRC Manual Chapter 0350, "Staff Guidelines For Restart Approval," to review outstanding issues requiring resolution prior to restart of Unit 1. Based on the independent inspection and reviews conducted at STP and described in Enclosure 4, the satisfactory resolution of those items addressed in the February 14, 1994, public meeting, and confirmation of the completion of remaining issues on February 15, 1994, the Panel recommended approving the resumption of operation of STP, Unit 1, in accordance with the facility Technical Specifications. In accordance with the February 3, 1994, memorandum from Director, DRP to the STP Restart Panel augmented inspection team coverage of the unit restart will commence about 24 hours prior to entry into Mode 2 operations and will continue until Unit 1 has demonstrated successful operation.

  
Samuel J. Collins, Chairman  
STP Restart Panel

Enclosures:

1. CAL, February 5, 1993
2. CAL, May 7, 1993
3. CAL, October 15, 1993
4. STP Restart Unit 1 Action Plan, Revision 4

cc w/enclosures:

Houston Lighting & Power Company  
ATTN: William T. Cottle, Group  
Vice President, Nuclear  
P.O. Box 289  
Wadsworth, Texas 77483

Houston Lighting & Power Company  
ATTN: James J. Sheppard, General Manager  
Nuclear Licensing  
P.O. Box 289  
Wadsworth, Texas 77483



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAR - 3 1994

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Regional Administrator

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Operational Readiness Plan submitted to the NRC in August 1993, which described specific actions to be taken prior to the resumption of power operation. Additionally, longer-term actions were described in the Business Plan submitted to NRC in October 1993. HL&P has initiated changes in the STP management from the Group Vice President, Nuclear to the Plant Managers, including a reorganization of the Nuclear Generation department.

On January 29, 1994, HL&P requested a meeting to brief the NRC on the status of the issues described in the February 5, 1993, CAL and its supplements. In the licensee's written submittal they described the actions taken in response to NRC concerns and included a summary of actions remaining prior to resumption of power operation. A public meeting was conducted at the site on February 14, 1994, and a briefing of the STP Restart Panel was conducted by teleconference on February 15, 1994, during which the licensee confirmed actions taken in preparation for the resumption of power operation of STP, Unit 1.

#### NRC Actions

The NRC Region IV Regional Administrator chartered the STP Review Panel on March 11, 1993. The STP Review Panel is composed of regional and program office managers and is to: (1) assure that a consistent approach to issues is being identified at STP and attempt to reach an agency consensus and united approach to addressing the problems at STP; (2) assure that the followup on safety significant issues is being properly coordinated and scheduled; (3) schedule significant meetings and inspections; (4) assure that the views and concerns of different NRC offices are properly addressed; and (5) assure proper coordination for the followup of issues that are identified by the Diagnostic Evaluation Team (DET) inspection.

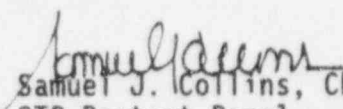
On April 12, 1993, it was determined that NRC Inspection Manual Chapter 0350, "Staff Guidelines for Restart Approval," was applicable for STP because of its extended shutdown and previous indications of serious deficiencies in licensee management effectiveness. The STP Review Panel assumed the role and responsibilities of the STP Restart Panel and issued the STP Restart Action Plan (Enclosure 4) which includes expected NRC actions required to be taken before restart of the STP Units.

In addition to the focused inspections conducted at STP since the shutdown of Units 1 and 2, an independent Operational Readiness Assessment Team (ORAT) inspection, led by the Special Inspection Branch of the Office of Nuclear Reactor Regulation, was conducted from December 6-10, 1993, and January 12-21, 1994. At the exit meeting conducted on January 21, 1994, the licensee committed to the resolution of issues regarding: (1) configuration management; (2) motor-operated valve opening under system pressure; and (3) surveillance weaknesses. The ORAT concluded that, pending the results of licensee actions concerning the above three items, the ORAT team would be generally supportive of a restart of Unit 1.

Based on the independent inspections and reviews conducted by the NRC staff and described in Enclosure 4 (STP Restart Action Plan), the licensee has satisfactorily completed the items specified in the CAL.

Restart Panel Meeting

The STP Restart Panel met on February 15, 1994, in accordance with NRC Manual Chapter 0350, "Staff Guidelines For Restart Approval," to review outstanding issues requiring resolution prior to restart of Unit 1. Based on the independent inspection and reviews conducted at STP and described in Enclosure 4, the satisfactory resolution of those items addressed in the February 14, 1994, public meeting, and confirmation of the completion of remaining issues on February 15, 1994, the Panel recommended approving the resumption of operation of STP, Unit 1, in accordance with the facility Technical Specifications. In accordance with the February 3, 1994, memorandum from Director, DRP to the STP Restart Panel augmented inspection team coverage of the unit restart will commence about 24 hours prior to entry into Mode 2 operations and will continue until Unit 1 has demonstrated successful operation.

  
Samuel J. Collins, Chairman  
STP Restart Panel

Enclosures:

1. CAL, February 5, 1993
2. CAL, May 7, 1993
3. CAL, October 15, 1993
4. STP Restart Unit 1 Action  
Plan, Revision 4

cc w/enclosures:

Houston Lighting & Power Company  
ATTN: William T. Cottle, Group  
Vice President, Nuclear  
P.O. Box 289  
Wadsworth, Texas 77483

Houston Lighting & Power Company  
ATTN: James J. Shoppard, General Manager  
Nuclear Licensing  
P.O. Box 289  
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L. J. Callan

-4-

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Licensing Representative  
Houston Lighting & Power Company  
Suite 610  
Three Metro Center  
Bethesda, Maryland 20814

L. J. Callan

-5-

Houston Lighting & Power Company  
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General Counsel  
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Shaw, Pittman, Potts & Trowbridge  
ATTN: Joseph R. Egan, Esq.  
2300 N Street, N.W.  
Washington, D.C. 20037

E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE01)

bcc distrib. by RIV:

- L. J. Callan
- Branch Chief (DRP/A)
- MIS System
- RIV File
- R. Bachmann, OGC, MS: 15-B-18
- A. Thadani, NRR M/S 8E2
- W. Russell, NRR M/S 12G18
- J. Roe, NRR M/S 13E4
- E. Adensam, NRR M/S 13E4
- RIV OEDO Coordinator, M/S 17G21
- STP Restart Panel Members
- C. Sudman, DRP

- Resident Inspector
- Lisa Shea, RM/ALF, MS: MNBB 4503
- DRSS-FIPB
- Project Engineer (DRP/A)
- Branch Chief (DRP/TSS)

RIV:RPC*	C:DRP/A*	<i>J for</i> SRV:DRP/A	D:DRP*	D:DRS*
SJCollins:myp	WDJohnson	DPLoveless	ABBeach	TPGwynn
2/ /94	2/ /94	2/2/94	2/ /94	2/ /94

AD:DRSS*	NRR*	NRR*	RIV:RPC	
DDChamberlain	LEKokajko	SCBlack	SJCollins	
2/ /94	2/ /94	2/ /94	2/3/94	

\*previously concurred



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

ENCLOSURE 1

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

FEB - 5 1993

Docket 50-498  
50-499  
License NPF-76  
NPF-80  
CAL 4-93-04

Houston Lighting & Power Company  
ATTN: Donald P. Hall, Group  
Vice President, Nuclear  
P.O. Box 1700  
Houston, Texas 77251

SUBJECT: CONFIRMATORY ACTION LETTER

Pursuant to our telephone conversation on February 4, 1993, it is our understanding that South Texas Project, Units 1 and 2, will not be taken critical until you have briefed the NRC staff of the results of your efforts to correct the overspeed trip condition that is affecting the turbine-driven auxiliary feedwater pumps.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, and 10 CFR 2.204, you are required to notify me immediately if your understanding differs from that set forth above.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee. Nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

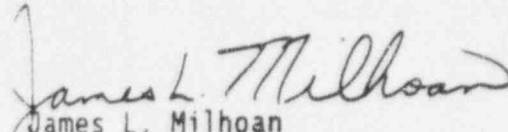
The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, Pub. L. No. 96-511.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,

  
James L. Milhoan  
Regional Administrator

cc:  
Houston Lighting & Power Company  
ATTN: William J. Jump, Manager  
Nuclear Licensing  
P.O. Box 289  
Wadsworth, Texas 77483

City of Austin  
Electric Utility Department  
ATTN: J. C. Lanier/M. B. Lee  
P.O. Box 1088  
Austin, Texas 78767

City Public Service Board  
ATTN: R. J. Costello/M. T. Hardt  
P.O. Box 1771  
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Houston Lighting & Power Company  
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General Counsel  
P.O. Box 61867  
Houston, Texas 77208

NRC Public Document Room

Texas Radiation Control Program Director

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

ENCLOSURE 2



REGION IV

511 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAY - 7 1993

Dockets: 50-498  
50-499  
Licenses: 'IPF-76  
'IPF-80  
CAL 4-93-04

Houston Lighting & Power Company  
ATTN: William T. Cottle, Group  
Vice President, Nuclear  
P.O. Box 1700  
Houston, Texas 77251

SUBJECT: CONFIRMATORY ACTION LETTER SUPPLEMENT

This supplements my Confirmatory Action Letter of February 5, 1993, which noted Houston Lighting & Power Company's management agreement that South Texas Project, Units 1 and 2, will not be taken critical until the NRC Staff has been briefed on the results of your efforts to correct the overspeed trip condition which affected the turbine-driven auxiliary feedwater pumps.

Because of the number of issues that have been identified both by your staff and the NRC, you agreed, in our telephone conversation of May 7, 1993, to include the following additional topics in your briefing of the NRC staff which will be scheduled later.

- The Station Problem Report process, including process improvements, threshold, and the results of your review of existing reports for issues affecting equipment operability and safe plant operation;
- The Service Request backlog, including reduction accomplished during the current outages and your review of outstanding Service Requests for issues affecting equipment operability, safe plant operation, and operator work-arounds;
- The postmaintenance test program, including corrective actions in response to recent violations and other process improvements and the basis for your confidence that equipment removed from service for maintenance is properly restored to an operable status;
- The outstanding design modifications, temporary modifications, and other engineering backlog items, including your review of these for issues affecting equipment operability, safe plant operation, and operator work-arounds;

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- Staffing in the operations department, including adequacy of current staffing levels, plans for replacing planned and unexpected losses to support safe plant startup and operation, and the adequacy of staffing under emergency conditions;
- The status of fire brigade leader training, including verification that this training meets regulatory requirements;
- The status of the fire protection computers, including reliability and functionality of operator interface;
- Management effectiveness in identifying, pursuing, and correcting plant problems, including any plans for independent reviews; and
- The results of your internal restart readiness reviews.

It is important that a thorough review of the backlogs in the areas of Service Requests, engineering items, and Station Problem Reports be conducted to assure that unknown equipment operability problems are identified and corrected. An example of a recent problem affecting safety-related equipment operability which had previously been identified in a Service Request was the missing screws in the Qualified Display Processing System. Weaknesses in the postmaintenance testing program have resulted in inoperable equipment being returned to service. The many outstanding design modifications should be carefully prioritized to ensure that those with importance to safety of operations are implemented in a timely manner and that no potential operability issues exist.

In view of the marginal staffing level in the operations department, it is important that unnecessary burdens and distractions be removed and that you have a plan in place to provide for contingencies and losses. Adequacy of the initial training for fire brigade leaders is an open issue and their overdue requalification training has resulted in an extra burden being placed on nonlicensed operators. Reliability of and operator interface difficulties with the fire protection computers has placed an extra burden on operators and could delay response to a fire in the plant. The outstanding temporary modifications which require additional operator actions, such as manual operation of automatic control systems, should be restored to minimize their impact on the efficiency of operators.

Weaknesses in problem identification, problem reporting, safety impact evaluation, root cause analysis, and corrective action processes have been observed in both the Station Problem Report process and in the Service Request process, indicating ineffective management of these areas.

This listing of topics for discussion is intended to focus the briefing on staff concerns involving potential safety issues. If other such topics are identified prior to the briefing, you will be advised by letter or telephone. Please inform me when your staff has made significant progress in addressing



these issues so I can schedule a special inspection prior to the briefing. All provisions of the February 5, 1993, letter remain in effect. If you have any questions, please feel free to contact me or Bill Beach of my staff.

Sincerely,

*James L. Milhoan*  
James L. Milhoan  
Regional Administrator

cc:  
Houston Lighting & Power Company  
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Nuclear Licensing  
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Bellport, New York 11713

Houston Lighting & Power Company

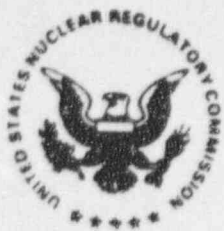
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

ENCLOSURE 3

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

OCT 15 1993

Dockets: 50-498  
50-499  
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NPF-80  
CAL 4-93-04B

Houston Lighting & Power Company  
ATTN: William T. Cottle, Group  
Vice President, Nuclear  
P.O. Box 1700  
Houston, Texas 77251

SUBJECT: CONFIRMATORY ACTION LETTER SUPPLEMENT 2

This is the second supplement to my Confirmatory Action Letter of February 5, 1993, which noted Houston Lighting & Power Company's management agreement that South Texas Project, Units 1 and 2, will not be taken critical until the NRC staff has been briefed on the results of your efforts to correct the overspeed trip condition which affected the turbine-driven auxiliary feedwater pumps.

As discussed with Mr. John Groth in a public meeting in Arlington, Texas, on October 5, 1993, the following topics have been identified as additions to the issues which must be resolved prior to startup of either South Texas Project unit. In a telephone conversation on October 15, 1993, you acknowledged these issues and agreed that these topics would be addressed in your briefing of the NRC staff in a meeting to be scheduled prior to unit startup.

The additional topics are:

- Effectiveness of the SPEAKOUT program;
- Standby diesel generator reliability;
- Essential chiller reliability;
- The system certification program;
- Reliability and operability of the feedwater isolation bypass valves;
- Adequacy of tornado damper testing; and
- Acceptability of the emergency preparedness accountability drill results.

These are not new issues, but they were considered to be significant following reviews of the Diagnostic Evaluation Report, your Operational Readiness Program, the allegation process, and recent NRC inspection findings. The complete results of these reviews are documented in NRC Inspection Report 50-498/93-31; 50-499/93-31. This listing of topics for discussion is

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intended to focus the briefing on staff concerns involving potential safety issues. If other such topics are identified prior to the briefing, you will be advised by letter or telephone. Please inform me when your staff has made significant progress in addressing these issues so I can schedule special inspections prior to the briefing. All provisions of the February 5, 1993, letter and its supplement of May 7, 1993, remain in effect. If you have any questions, please feel free to contact me or Mr. Art Howell of my staff.

Sincerely,

  
James L. Milhoan  
Regional Administrator

cc:  
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Houston Lighting & Power Co.

-3-

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