



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 32 AND 23 TO
FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80
HOUSTON LIGHTING & POWER COMPANY
CITY PUBLIC SERVICE BOARD OF SAN ANTONIO
CENTRAL POWER AND LIGHT COMPANY
CITY OF AUSTIN, TEXAS
DOCKET NOS. 50-498 AND 50-499
SOUTH TEXAS PROJECT, UNITS 1 AND 2

1.0 INTRODUCTION

By application dated January 8, 1991 (ST-HL-AE-3630), Houston Lighting & Power Company, et. al., (the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License Nos. NPF-76 and NPF-80) for the South Texas Project, Units 1 and 2 (STP). The proposed changes would remove certain outdated references regarding the requirements for the licensee's retraining and replacement training program. The requirements were superseded by Generic Letter 87-07 and the April 1987 revision to 10 CFR Part 55. Supplemental information was provided by the licensee's letter of October 3, 1991 (ST-HL-AE-3885), which did not alter the action or change the initial no significant hazards consideration determination. The January 24, 1992, supplemental letter provided an implementation date.

2.0 BACKGROUND

The STP Technical Specification (TS) 6.4.1 (Training) currently states that a retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 to the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

Part 55 of Title 10 of the Code of Federal Regulations was revised in April 1987, and no longer contains an Appendix A.

The March 28, 1980 letter was issued by the Director, Office of Nuclear Reactor Regulation of the NRC. Sections A and C of Enclosure 1 to this letter provided supplemental requirements of a retraining and replacement training program for the unit staff. The response to Question 1 of NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," addresses supersession of training requirements in the March 28, 1980 letter by the new rule:

- Q.1. The Supplemental Information to NRC Generic Letter 87-07 states that, "These rules supersede all current regulations for operator licenses." Are training requirements from Mr. H. R. Denton's March 28, 1980 letter superseded by the new rule?
- A. The rule supersedes all requirements where those requirements are less restrictive. Where individual commitments are more restrictive, you must follow those commitments until you change them.

3.0 EVALUATION

On March 19, 1987, the NRC issued Generic Letter (GL) 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Conforming Amendments." Among other issues, the GL gave licensees the option of substituting an accredited, systems-approach-to-training (SAT) based training program for initial and requalification training programs previously approved under Appendix A of 10 CFR Part 55. This option may be implemented without further NRC review or approval upon written notification that the substitute training program is both accredited and SAT-based. Further, this option allows licensees to make subsequent revisions to the content of accredited, SAT-based training programs without NRC review and approval.

In its letter of October 3, 1991, the licensee informed the staff that the STP operator training has been accredited by the Institute for Nuclear Power Operations (INPO) and that the licensee is a member of the National Academy for Nuclear Training. By virtue of the fact that the STP training program is accredited by INPO, it is SAT-based. Therefore, the proposed changes to the plant TS are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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