

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Systematic Assessment of Licensee Performance

NRC Inspection Report: 50-498/83-26
50-499/83-26

Construction Permits: CPPR-128
CPPR-129

Dockets: 50-498; 499

Licensee: Houston Lighting & Power Company (HL&P)
P.O. Box 1700
Houston, Texas 77001

Facility Name: South Texas Project, Units 1 and 2

Appraisal Period: December 1, 1982, through November 30, 1983

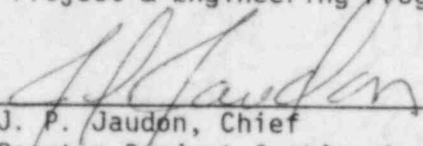
Licensee Meeting: May 10, 1984

SALP Board: J. E. Gagliardo, Director, Division of Resident, Reactor
Project & Engineering Programs (Chairman)
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Other Attendees:

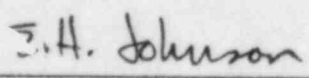
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4/10/84
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I. INTRODUCTION

The NRC has established a Systematic Assessment of Licensee Performance (SALP) program as an integrated NRC staff effort to collect available observations and data on a predetermined schedule and to evaluate licensee performance based on these observations and data. Emphasis is placed upon NRC understanding the licensee's performance in the 13 functional areas listed in the body of the report and discussing and sharing this understanding with the licensee. SALP is an integrated part of the regulatory process used to assure licensee's adherence to the NRC rules and regulations. SALP is oriented toward furthering NRC's understanding of the manner in which: (1) the licensee management directs, guides, and provides resources for assuring plant safety; and (2) such resources are used and applied. The integrated SALP assessment is intended to be sufficiently diagnostic to provide meaningful guidance to licensee management related to quality of plant construction.

The integrated review was conducted by a SALP Board composed of NRC personnel who are knowledgeable of the licensee's activities. The SALP Board met on January 25-26, 1984, to review data and observations and to assess the licensee's performance in 13 areas. This SALP report is the SALP Board's assessment of the licensee's safety performance at the South Texas Project during the period of December 1, 1982, through November 30, 1983.

No SALP Report was issued for the period between June 30, 1981, and December 1, 1982. NRC Inspection Report 79-19, released in early 1980, resulted in the issuance of an Order to Show Cause why construction should be allowed to continue. HL&P chose to terminate the services of the company originally selected to perform the architect engineering and construction functions and subsequently engaged Bechtel Power Corporation to act as architect engineer and Ebasco Services, Inc., to complete the construction of the two units. No significant engineering or construction activities were accomplished during this period. A detailed status program for installed equipment and systems was jointly accomplished by Bechtel and the previous constructor prior to the resumption of construction. Maintenance of the installed equipment and warehouse storage were the principal activities being performed during this time.

II. CRITERIA

Licensee performance was assessed in 13 selected functional areas. Each of these functional areas represents an area significant to nuclear safety. Evaluation criteria as listed below were used, as appropriate, in each of the functional area assessments:

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from safety standpoint
3. Responsiveness to NRC initiatives

4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

In addition, SALP Board members considered other criteria, as appropriate. Based upon the SALP Board assessment, each functional area evaluated is classified in one of the three performance categories. The definition of each of these performance categories is:

Category 1: Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2: NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3: Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

III. SUMMARY OF RESULTS

In summary, the licensee's performance, as determined during the SALP Board meeting, is shown in the table below.

SUMMARY OF RESULTS

<u>Functional Area</u>	<u>Category</u>
A. Soils and Foundations	3
B. Containment and Other Safety-Related Structures	2
C. Piping Systems and Supports	1
D. Safety-Related Components	2
E. Support Systems	NA
F. Electrical Power Supply and Distribution	1
G. Instrumentation and Control Systems	NA

H. Licensing Activities	1
I. Corrective Action and Reporting	3
J. Design Control	2
K. Material Control	3
L. Quality Assurance	2
M. Management Control	2

Twenty-six NRC inspections were conducted during this evaluation period involving a total of 1505 inspection hours.

IV. PERFORMANCE ANALYSIS

A. Soils and Foundations

1. Analysis

This area was periodically examined by the NRC senior resident inspector (SRI). Observation included placement and compaction. No violations or deviations were reported during this period. However, two violations have been subsequently identified which relate to activities which were ongoing during the appraisal period. A violation of the standard test method of determining the minimum density of backfill was identified. This deviation from the ASTM standard was implemented through the use of an interoffice memo and was not reflected by a specification change notice. The second violation related to the quality control inspections of backfill operations. The procedure required backfill monitoring on a daily basis. As a result of this, only one inspection form was generated each day. This form was considered inadequate in that the specific locations of the QC inspections could not be determined. This represents a failure on the part of the licensee to rectify issues raised in the Show Cause Order concerning the adequacy of backfill inspection.

2. Conclusions

The violations noted above are indicative of the need for improvements in quality control attention and management oversight in this functional area. The licensee is considered to be in performance Category 3 for this area.

3. Board Recommendation

a. Recommended NRC Action

The NRC inspection effort in this area should be increased to assure implementation of corrective actions until completion of all soil related work.

b. Recommended Licensee Action

The licensee management attention and involvement should be increased. The licensee's QA department should assure that modifications to procedures and specifications do not cause deviation from commitments.

B. Containment and Other Safety-Related Structures

1. Analysis

Several inspections were performed in this functional area during this period. Limited inspection was performed on the Unit 1 containment building since it is essentially complete. Inspections were performed on both containments and associated safety-related buildings. One violation was identified during these inspections related to free-form concrete placement on Unit 1 containment dome. The underlying cause of the violation was determined to be procedures which did not provide adequate instructions or precautions for free-form concrete placements. This was corrected by revising the placement procedure to incorporate a requirement for a pre-placement conference prior to any free-form or unusual concrete placement. The conferences are conducted on the day prior to concrete placement, and attendance is mandatory for all personnel involved with the placement.

A significant number of concrete placements were observed by the SRI for Unit 1 and 2 containments and associated buildings during the assessment period. Generally, the concrete was well batched and transported to the placement site without delay. Placement was proper and vibration was performed in the required manner.

2. Conclusion

Licensee management attention and involvement in this functional area are generally evident. Corrective actions for identified problems are generally timely and effective.

The licensee is considered to be in performance category 2 in this area.

3. Board Recommendations

a. Recommended NRC Action

The NRC inspection effort in this area should be maintained at the present level.

b. Recommended Licensee Action

Licensee management oversight in this area should continue at a level commensurate with the tempo of construction activities.

C. Piping Systems and Supports

1. Analysis

Approximately 5% of the safety-related piping had been installed by the end of this reporting period. This limited both the number and extent of the inspections performed in this area. Although both large and small bore piping was installed in Unit 1, the primary NRC inspection emphasis was on the installation of the reactor coolant system (RCS) loop piping. No violations or deviations were identified during the NRC inspections in this functional area.

2. Conclusions

Although there has been limited activity in this functional area, there is consistent evidence of management attention and oversight. The resolution of issues has been timely and thorough. The licensee is considered to be in performance category 1 in this area.

3. Board Recommendations

a. Recommended NRC Action

Although a category 1 rating would normally permit a reduction of NRC inspection effort, it is appropriate to continue or even increase the effort in this important functional area to be commensurate with the tempo of construction activities.

b. Recommended Licensee Action

Although management attention to this area has been in evidence, the increase in construction activities will require a corresponding increase in oversight to assure that the current level of quality is maintained.

D. Safety-Related Components

1. Analysis

Inspections of safety-related components during this evaluation period were primarily in the areas of storage and preservation

of components and resolution of nonconformances related to the documentation and installation of previously installed components. During the disposition of these nonconformances, specific items were identified relative to the levelness of the reactor vessel and the vertical alignment of the steam generators. These items are still being resolved.

2. Conclusion

Licensee resources are adequate and managed effectively in this functional area. Some safety-related components have been moved from the warehouses to construction areas for temporary or in-place storage. Inspections and record review indicate that protective measures have been adequate and in accordance with the manufacturers' requirements. The licensee is considered to be in performance category 2 for the transportation, installation, and preservation of safety-related components.

3. Board Recommendations

a. Recommended NRC Action

The NRC should continue the inspection effort at the same level, focusing on inspection of piping and electrical hook-up completions. NRC effort should increase commensurate with the increase of construction activities in this functional area.

b. Recommended Licensee Action

Management involvement and oversight in this functional area should remain consistent with the level of construction activity.

E. Support Systems Including HVAC and Fire Protection

Work in this functional area was not observed and no assessment was made.

F. Electrical Power Supply and Distribution

1. Analysis

During the assessment period, limited inspections of this functional area were performed. They included the reinstallation of previously installed electrical cable trays, tray supports, and temporary installation of electrical switch gear and cabinets. No violations or deviations were identified during these inspections.

2. Conclusions

Management involvement and oversight in this functional area is clearly evident. The licensee is considered to be in performance category 1 in this functional area.

3. Board Recommendations

a. Recommended NRC Action

NRC inspection activities in this area should be conducted at a level commensurate with the scope of work.

b. Recommended Licensee Action

Management oversight and involvement in this functional area should be commensurate with the level of electrical systems installation activities.

G. Instrumentation and Control Systems

Work in this functional area was not observed and no assessment was made.

H. Licensing Activities

See Attachment A to this report.

I. Corrective Action and Reporting

1. Analysis

During the assessment period two violations and one deviation were identified in area of corrective action. These are identified in section V below (8320-02, 8322-01 and 8322-02). The licensee has issued 40 Incident Review Committee actions in accordance with 10 CFR 50.55(e) during this assessment period. Upon further review, it was determined that ten of them were reportable. These are identified in Section V.b.2 below. Of the 40 potential reportable items, 25 were site related and 15 were related to suppliers.

The violations noted in this functional area related to the accomplishment of corrective actions initiated as a result of deficiencies which occurred under the previous contractor. These indicate some weakness in tracking committed corrective

actions. With regard to reporting, the NRC's review of the potentially reportable items confirmed the licensee's decisions on reportability.

2. The licensee's reports are timely. However, they are generally weak in stating the corrective actions that will be taken to preclude repetition on supplier related items. The violations indicated above indicate some weakness in management's oversight of the corrective action program and the thoroughness of resolution of identified issues.

The licensee is considered to be in performance category 3 in this area.

3. Board Recommendations

- a. Recommended NRC Actions

The NRC's inspection effort in this area shall be increased. Particular focus should be placed on reviewing the licensee's system for tracking corrective action.

- b. Recommended Licensee Actions

Licensee management attention and oversight in this area should be increased. Particular emphasis needs to be placed on the process of evaluating the underlying causes for potentially reportable deficiencies and formulation of comprehensive corrective actions and the system for tracking these items to completion.

- J. Design Control

1. Analysis

The design change program and design document control program are reviewed as part of the NRC's routine inspection program. No violations or deviations were noted in two functional areas. The licensee issued one stop-work order related to design document control when it was discovered that a drawing that was not the latest revision was issued for field work. It was determined that the increasing number of drawings sent from engineering had caused a backlog in the reproduction department and consequently a delay in reaching the field. Corrective action for this item was timely and thorough.

To provide additional control over the design process, the licensee has developed an engineering assurance program to evaluate specific engineering concerns.

2. Conclusions

Management attention in this area is evident. Resolution of issues are generally timely and technically sound. Adequately stated policies and procedures are in place to control the design process, and routine audits are conducted to assure compliance to these procedures. The licensee is considered to be in performance category 2 in this functional area.

3. Board Recommendations

a. Recommended NRC Actions

The level of NRC effort in this functional area should remain the same.

b. Recommended Licensee Actions

Management attention and oversight in this area should be continued at the same level and should focus on assuring that the designs are adequate and the design change process is properly controlled.

K. Material Control

1. Analysis

The licensee and contractors have encountered numerous problems with the material control system used by the previous constructor. There has been an on-going program to verify that the previously installed material and the material in stock is properly documented. This has been especially noted in the area of embeds and anchor bolt material. Bechtel has recently initiated a program for the identification of bulk material (steel plate, structural shapes, etc.) using a paint color code. This system of paint identification is based on the end-use of the material and not the material grade and type

One violation identified in Section V (8317-01) and one self-imposed stopwork order have resulted from the material identification and control problems encountered during this report period.

2. Conclusions

Management oversight and involvement in this area is apparent but has not yet been able to address and correct some of the problems that are evidenced by the violation discussed above.

Instances have been identified where different materials were commingled under the control program of the previous contractor. This is still an issue that is being resolved. Although there have been improvements in this area, some weaknesses still exist. The licensee is considered to be in performance category 3 in this functional area.

3. Board Recommendations

a. Recommended NRC Action

NRC inspection effort should be increased in the area of material identification and control. This should include review of material verification at the time of receipt and continue through the fabrication, erection, installation, and use of the materials.

b. Recommended Licensee Action

Licensee management involvement in this functional area should be increased until the existing problems are resolved and measures are established to ensure the identification and control of all materials used in safety-related applications.

L. Quality Assurance

1. Analysis

The South Texas Project quality assurance program is described in the quality assurance program description (QAPD) for the licensee (HL&P), the architect-engineer Bechtel Power Corporation (Bechtel), and the constructor Ebasco Services, Inc. (Ebasco). The QAPD provides for three tier quality assurance/quality control coverage of site construction activities. Principal quality assurance coverage of site activities is provided by Bechtel. The licensee, in turn, conducts numerous audits of Bechtel as well as independent verification of Bechtel performance through audits of the constructor and sub-contractors.

The licensee quality assurance department for onsite activities is divided into two basic sections: construction and operations. The construction QA section under the direction of the acting project QA manager, consists of a supervisor for each of six functional groups and a total of 23 QA specialists. The operations QA section, under the direction of the operations QA manager, consists of two supervisors and three specialists.

This section is relatively new and has not yet been fully staffed. The major responsibilities of these groups consist of developing and administering the HL&P QA plan, monitoring and evaluating the QA programs of the architect-engineer, and the constructor, inspecting selected construction activities, performing audits, reviewing procedures, and administering the HL&P training and certification program.

The Bechtel project quality assurance program is directed by the project quality assurance manager who is responsible for assuring that quality assurance or quality control actions are accomplished in accordance with the requirements of the project. Functions in this area include, but are not limited to, audits and surveillances of project quality-related functions, reviews of supplier and contractor QA program requirements, identification of problems, receipt inspection of permanent plant material, maintenance and storage of plant equipment in storage, reviewing quality documentation, and reinspection of contractors completed work as deemed necessary. A more thorough description is available in Bechtel Topical Report BQ-TOP 1, Revision 3A.

The Ebasco quality assurance program is described in Ebasco Topical Report ETR-1001, Revision 11. Ebasco's onsite quality assurance organization is under the direction of the quality program site manager and is comprised of three basic departments: quality assurance, quality control, and quality records. The responsibilities of these groups include the receiving inspection of nonpermanent plant materials, calibration of measuring and test equipment, reviews and audits of site quality activities, audits of construction activities, performance of nondestructive examinations, auditing of suppliers, training of personnel, and generation storage, and maintenance of quality records.

2. Conclusion

With respect to quality assurance at the South Texas Project, it was concluded that satisfactory performance is being achieved. In general, it was determined that the quality control program of the constructor examines and records the attributes necessary to verify that the construction is being performed in accordance with the drawings, specifications, and procedures as required. Observation of construction activities, discussion with crafts and QA/QC inspectors and review of records indicates that the quality control activities are functioning as intended. Audits and surveillances are

performed as required. Although the licensee does not approve all site procedures for subcontractors, the audit program provides a means for review of these procedures.

The licensee is considered to be in performance category 2 in this functional area.

3. Board Recommendations

a. Recommended NRC Action

NRC inspection effort will continue at the present level. Some areas will increase due to the increased construction activity such as code-related pipe welding. Increased inspection activity may be required in some areas such as material control to assure that programs implemented by the licensee and contractor provide the desired results.

b. Recommended Licensee Action

The licensee's attention and oversight of the implementation of the quality assurance program should continue as heretofore demonstrated. The licensee should increase audit/surveillance activities in areas where problems have been found in other plants. Of particular interest, should be plants utilizing the same design, the same suppliers, the same contractors, or similar control systems. The licensee should also monitor closely the activities of the QC organization and consider increasing the QC staff as the scope or complexity of construction increases.

M. Management Control

1. Analysis

Licensee management oversight and involvement in safety-related activities are not specifically inspected, however these attributes are considered in each NRC inspection of the facility.

Senior licensee management officials spend a portion of each week at the sites to follow activities. In addition, frequent meetings are conducted with the project supervisors for each of the principal contractors. During these visits senior HL&P managers discuss site activities and NRC concerns with the NRC

senior resident inspector. Senior management also conducts frequent discussions with officials from other utilities to assure that lessons learned from these sites are reviewed for their applicability to STP.

2. Conclusion

Corporate management is generally involved in site activities although some weaknesses have been noted. Reviews are usually timely, thorough and technically sound. Responses to NRC initiatives are generally timely.

The licensee is considered to be in performance category 2 in this functional area.

3. Board Recommendations

a. Recommended NRC Actions

The NRC inspection effort in this functional area should continue at the normal level as part of the routine on-going inspection program.

b. Recommended Licensee Actions

Licensee management should continue to develop an aggressive attitude toward the oversight and control of all site activities. This is especially important as construction activities shift away from primarily civil and structural work to primarily system and component installation.

V. SUPPORTING DATA AND SUMMARIES

A. Violations

The NRC inspectors identified six violations and one deviation during the assessment period.

These are listed below:

8302-01	Severity Level V	Failure to Meet Record Retention Requirements
8311-01	Severity Level V	Inadequate Procedures/Instructions
8317-01	Severity Level IV	Failure to Maintain Identification and Control of Materials

8320-01	Severity Level V	Failure to Meet Record Retention Requirements
8322-01	Severity Level IV	Failure to Preclude Repitition of a Significant Condition Adverse to Quality
8322-02	Severity Level IV	Failure to Take Corrective Action
8320-02	Deviation	Failure to Perform Committed Hardness Tests on site

B. Licensee Report Data

1. Licensee Event Reports (LER)

(Not applicable)

2. Deficiency Reports

The licensee issued 10 reportable deficiency reports during the assessment period.

*G12-135	LAPP Insulator Failures
*G12-136	Limit Switches for <u>W</u> EMD Gate Valves
*G12-144	ESF Load Center Transformers
*G12-145	W DS-416 Reactor Trip Switch Gear
G12-146	Reactor Containment Fan Cooler Design
G12-151	<u>W</u> Process Control and Protection System
*G12-152	<u>W</u> Instrumentation
G12-153	ECW Pump Instrumentation
G12-168	Corrosion in SIS Weld
G12-170	RCB Mechanical Penetrations

*Supplier Related

3. Part 21 Reports

(None)

C. Licensee Activities

Construction and design work proceeded on a relatively routine basis during this period. At the end of the assessment, the licensee reported Unit 1 at 48% complete and Unit 2 at 22%.

D. Major Inspection Activities

None



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

Attachment A

Facility Name: South Texas Project
Applicant: Houston Lighting & Power Company
NRR Project Manager: Annette L. Vietti

I. INTRODUCTION

This report presents the results of an evaluation of the applicant, Houston Lighting & Power Company, in the functional area of licensing activities. It is intended to provide NRR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period December 1, 1982 to November 30, 1983.

The basic approach used for this evaluation was to first select a number of licensing issues which involved staff manpower. Comments were then solicited from the staff reviewers. These reviewers applied the evaluation criteria for the performance attributes based on their experience with the applicant for the applicant's products. Finally, this information was assembled in a matrix which allowed an overall evaluation of the applicant's performance.

For the December 1, 1982 to November 30, 1983 period, limited licensing review actions were carried out with the applicant. Staff interactions with applicant primarily involved information meetings at the applicant's request. Therefore, the NRR staff has commented on these meetings and any submittals or telephone conferences resulting from the meetings.

II. Summary of Results

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating should be tempered with judgement with respect to the significance of the individual elements.

Based on this approach, the performance of Houston Lighting & Power Company in the functional area - Licensing Activities - is rated Category 1.

III. Criteria

Evaluation criteria, as given in NRC Manual Chapter Appendix 0516, Table 1, were used for this evaluation.

IV. Performance Analysis

The applicant's performance evaluation is based on a consideration of seven attributes as given in the NRC Manual Chapter. For all of the licensing actions considered in this evaluation, only four of the attributes were of significance. The composite rating is based on the following attributes:

- A. Management involvement
- B. Approach to resolution of technical issues
- C. Responsiveness to NRC initiatives
- F. Staffing

There was no NRR evaluation basis for D) Enforcement History, E) Reportable Events and G) Training, in the licensing review effort.

The evaluation was based on the following licensing activities:

- 1. Fire Protection
- 2. Elimination of Tornado Proof Roof on the Isolation Valve Cubicle
- 3. Pipe Break
- 4. Safe Shutdown
- 5. Engineering Assurance Program
- 6. Detailed Control Room Design Review (DCRDR)

A. Management Involvement in Assuring Quality

Overall rating for this attribute is Category 1. As mentioned previously, staff interactions with the applicant primarily involved information meetings that the applicant requested. From these meetings it was evident that corporate management was involved in the approaches to resolving technical issues from a safety standpoint. Management has shown significant interest in getting staff comments on HL&P proposals by initiating meetings on the licensing activities evaluated. Significant management representation was shown at the In-Progress Audit of the DCRDR.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

The overall rating for this criterion is Category 1. The applicant has demonstrated prior planning by their willingness to take the initiative in requesting meetings for staff input and by providing the necessary information for staff review. HL&P has, during this review period, increased activity in updating the Final Safety Analysis Report (FSAR) through several amendments. HL&P has played an active role in the generic issue, leak before break, by making a plant specific submittal to the staff early in the staff's review of the generic issue. HL&P has initiated and formally submitted an Engineering Assurance Program

for review, described as an ongoing independent review of the South Texas Project design to confirm the adequacy of the engineering work performed by HL&P and contractor personnel. This program is currently under review by the staff. At the In-Progress Audit of the DCRDR, HL&P demonstrated a clear understanding of the issues and presented technically sound and thorough approaches to resolving problems.

C. Responsiveness to NRC Initiatives

HL&P had taken the initiative in seeking NRC approval of licensing activities 2, 3 and 5 and therefore were prompt in making formal submittals and in responding to NRC requests for additional information. Responsiveness to licensing activities 1 and 4 were considered not applicable at this time since HL&P is not scheduled to submit this information until mid 1984, after which, the staff will initiate their review. The In-Progress Audit of the DCRDR indicated that the DCRDR is being conducted in a timely and thorough manner. On day to day licensing actions, the licensee has been prompt and responsive to NRC inquiries.

D. Enforcement History

The enforcement history during this evaluation period did not involve issues related to areas covered by licensing activities.

E. Reportable Events

The reportable events during this evaluation period did not involve issues related to areas covered by the licensing activities.

F. Staffing

Category 1 is assigned based on involvement with the applicant's staff at various meetings with the NRC. The licensee provided technically competent representatives with the appropriate support people in all the licensing activities evaluated.

G. Training

The licensing actions related to safety issues covered by NRR did not progress to the level to evaluate training.

V. Conclusion

Based on the evaluation of Houston Lighting & Power Company's performance for the limited number of activities in the functional area of licensing, an overall performance rating of Category 1 is determined.

Staff activity has been minimal because of the early stage of the licensing review for a plant with a schedule based on a December 1986 fuel load date. Except for the In-Progress Audit of the DCRDR, staff contact and involvement with HL&P has been very slight, even on the licensing activities evaluated. Therefore, the NRR SALP evaluation is limited. However, for typical licensing activities such as meeting on various technical issues, the licensee's performance has been rated Category 1.