

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

In the matter of)
)
HOUSTON LIGHTING & POWER CO.) Docket Nos.: 50-498 and 40-499
)
South Texas Project Electric)
Generating Station) Date: February 10, 1992
(Units 1 and 2))
_____)

PETITION (10 C.F.R. 2.206)

Pursuant to Title 10 of the Code of Federal Regulations Part 2.206, specific action by the United States Nuclear Regulatory Commission (NRC) is requested as described herein.

Specific Request:

1. Upon receipt of this petition, and within a reasonable time, I request that the NRC institute a show cause proceeding pursuant to 10 C.F.R. 2.202 directed to its licensee the Houston Lighting and Power Company (Licensee), who operates the South Texas Electric Generating Station (STPEGS), near Wadsworth, Texas.

2. Initiate swift and effective actions to cause your Licensee to immediately revoke ALL ESCORTED ACCESS to the STPEGS.

3. Initiate swift and effective actions to cause your Licensee to immediately invoke a STAND-DOWN of all maintenance activities at STPEGS.

4. Initiate swift and effective actions to cause your Licensee to comply with STPEGS Technical Specifications and procedures.

5. Initiate swift and effective actions to cause your Licensee to adequately train all STPEGS employees in the use of department relevant Security Procedures.

6. Initiate swift and effective actions to cause your Licensee to adequately train all STPEGS Security Force personnel in the use of Security Procedures.

7. Initiate swift and effective actions to cause your Licensee to adequately train all STPEGS employees in the use of the Work Process Program (OPGP03-ZA-0090) Revision 3. Reference Plant Bulletin #180 dated 01-29-92.

8. Initiate swift and effective actions to cause your Licensee to adequately train all STPEGS employees in the use of Maintenance Work Practices and Requirements (OPMP01-ZA-0040) Revision 0. Reference Plant Bulletin #180 dated 01-29-92.

9. Initiate swift and effective actions to cause your Licensee to adequately train all STPEGS employees in the use of the Planner's Guide Revision 0. Reference Plant Bulletin #180 dated 01-29-92.

Basis and Justification:

a) Current established Licensee policies and procedures do not provide reasonable assurances for the "PHYSICAL CONTROL OF STPEGS".

b) Licensee employees are not adequately trained and knowledgeable of existing STPEGS Security Procedures which address escort responsibilities.

c) Licensee employees are not adequately trained and knowledgeable of existing STPEGS Security Procedures which address tailgating into protected and vital station areas.

d) Licensee's Security Force personnel are not adequately trained and knowledgeable of existing STPEGS Security Procedures which address escort responsibilities.

e) Licensee's Security Force personnel willfully and intentionally falsified STPEGS security documents.

f) Licensee's Security Force personnel willfully violated STPEGS security procedures.

g) Licensee's employees willfully and intentionally violated STPEGS security procedures.

h) Your Licensee's current Work Practices do not provide reasonable assurance for the safe operation of STPEGS and therefore, the Health and Safety of the General Public.

i) Licensee employees are not adequately trained and knowledgeable of the current STPEGS Work Process Program (OPGP03-ZA-0090) Revision 3.

j) Licensee employees are not adequately trained and knowledgeable of the current STPEGS Maintenance Work Practices and Requirements (OPMP01-ZA-0040) Revision 0.

k) Licensee employees are not adequately trained and knowledgeable of the current STPEGS Planner's Guide Revision 0.

l) Licensee employees are engaged in continuing work practices which are in violation of the STPEGS Work Process Program (OPGP03-ZA-0090) Revision 3.

The cooperation of the NRC in processing this petition to ensure the safe operation of the STPEGS and therefore, the Health and Safety of the General Public is both anticipated and appreciated.

Respectfully submitted,


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