

# The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

April 13, 1992

ST-HL-AE-4030  
File No.: G25  
10CFR50.54(q)

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Collection and Analysis of Sample  
Media for Radiological Monitoring Drills

Houston Lighting & Power Company (HL&P) is revising the criteria for collection and analysis of sample media during Radiological Monitoring drills at the South Texas Project (STP). Currently, sample media such as air, soil, and water are to be collected and analyzed during annual Radiological Monitoring drills. Under the revised program, annual drills will include collection and analysis of airborne activity and ground deposition surveys, with collection and analysis of vegetation, soil, and water at least once every five years. Reducing the frequency to once every five years will not reduce the effectiveness of the Emergency Plan. The revised wording is indicated on the attached excerpt from the STP Emergency Plan.

The current Emergency Plan program for Radiological Monitoring Drills is given in Section N.d of NUREG-0654, which states:

Plant environs and radiological monitoring drills (onsite and offsite) shall be conducted annually. These drills shall include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping.

Collection and analysis during drills are to ensure that personnel responsible for performing these duties are trained and qualified. However, collection and analysis is normally performed on a weekly to annual basis (depending on the sample type), so that performing those actions during annual drills does not enhance personnel training and qualification.

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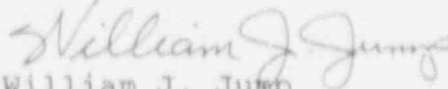
A Subsidiary of Houston Industries Incorporated

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The revised sampling schedule is appropriate and consistent with the guidance of NRC Inspection Procedure 82302, "Review of Exercise Objectives and Scenarios for Power Reactors." Under Specific Guidance, section 03.02.b 2(m) states that field monitoring, including soil, vegetation, and water sampling, is included under elements that should be exercised over a 5-year period.

This change has been approved by the STP Plant Operations Review Committee, and is to be implemented effective June 1, 1992.

If there are any questions on this matter, please contact Mr. P. L. Walker at (512) 972-8392 or me at (512) 972-7205.

  
William J. Jump  
Manager,  
Nuclear Licensing

PLW/amp

Attachment: Proposed Sampling Frequency Change

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION

EMERGENCY PLAN

TABLE N-1  
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DRILLS AND EXERCISES

RADIOLOGICAL MONITORING DRILLS - Radiological Monitoring Drills shall be conducted at the Station annually. These drills shall provide for the monitoring of plant environs and radiological monitoring on site and offsite. These drills shall include collection and analysis of airborne activity, ground deposition surveys, and provide provisions for communications and record keeping. At least once every five years collection and analysis will also include vegetation, soil and water. The State drills may not always be conducted at the Station. These drills will demonstrate the ability to coordinate with and make appropriate recommendations to the State of Texas, Department of Health Bureau of Radiation Control.

- A. Health Physics Drills shall be conducted semi-annually which involve response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment.
  
- B. Analysis of inplant liquid samples with actual elevated radiation levels including use of the post-accident sampling system shall be included in Health Physics drills annually. These drills will include appropriate radiation protection and contamination controls.

In addition to the scheduled drills and exercises, a program of simplified table top drills and training drills called walkthroughs will be conducted. The purpose of these table top drills and walkthroughs is to provide a controlled session of training at the assigned emergency response facility for emergency response personnel in the actions required during a declared emergency or during an exercise period.

REVISION - 1992

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