



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

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

JAN 21 1996

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

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS  
QUALITY ASSURANCE PLAN CHANGE QA-026

We have reviewed your Operations Quality Assurance Plan Change QA-026 submitted by your Letter ST-HL-AE-5236, dated December 13, 1995. This change removes the requirement that all safety-related procedures be reviewed no less frequently than every 2 years. Your letter states that this change is not a reduction in commitment of the Operations Quality Assurance Plan in accordance with 10 CFR 50.54(a).

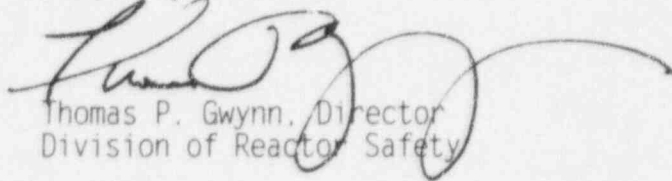
Our review has determined that the removal of the requirement to review all safety-related procedures no less frequently than every 2 years is a reduction in commitment of your Operations Quality Assurance Plan and, as such, requires NRC approval prior to implementation. Biennial reviews of procedures are important to determine the adequacy of current procedures and whether additional changes are necessary or desirable. To help ensure that reductions in this area are consistently implemented and to ensure that safety-related procedures are maintained current, the Office of Nuclear Reactor Regulation issued guidance for biennial plant procedure reviews in a letter dated December 21, 1992. In a telephone discussion on January 16, 1996, with Mr. John Salvage of your staff, Mr. Robert Pate of my staff discussed this guidance and agreed to forward a copy for your use. This guidance is included as an enclosure to this letter. As discussed with Mr. Salvage, all requests for exceptions to the requirements for biennial review of procedures will be evaluated using the guidance contained in the enclosure.

Your submittal indicated that biennial reviews are redundant to the programmatic controls you already have in place, which require an assessment of the impact on plant procedures. However, there was not enough information in your submittal to permit an evaluation of these controls in accordance with the guidance provided by Enclosure 1. In order to support the continued evaluation of your submittal, you are requested to provide a description of your programmatic controls and how these controls satisfy the guidance provided in the enclosure. We will continue our review when we receive this additional information.

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P PDR

Any questions you may have concerning this review should be directed to Mr. C. A. VanDemburgh of my staff at (817) 860-8161.

Sincerely,



Thomas P. Gwynn, Director  
Division of Reactor Safety

Dockets: 50-498  
50-499  
Licenses: NPF-76  
NPF-80

Enclosure:  
NRC Plant Procedure Review Guide

cc w/enclosure:  
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City of Austin  
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City Public Service Board  
ATTN: K. J. Fiedler/M. T. Hardt  
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San Antonio, Texas 78296

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State of Texas  
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Office of the Governor  
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Environmental Policy  
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Matagorda County Courthouse  
1700 Seventh Street  
Bay City, Texas 77414

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ATTN: Mr. J. W. Beck  
44 Nichols Road  
Cohasset, MA 02025-1166

E-Mail report to D. Nelson (DJN)  
 E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE52)

bcc distrib. by RIV:

L. J. Callan  
 Branch Chief (DRP/A)  
 MIS System  
 RIV File  
 R. Bachmann, OGC (MS: 15-B-18)  
 W. Ang

Resident Inspector  
 Leah Tremper (OC/LFDCB, MS: TWFN 9E10)  
 DRS-PSB  
 Project Engineer (DRP/A)  
 Branch Chief (DRP/TSS)  
 R. Gramm, NRR (OWFN 10A19)

DRS AI 95-140

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RPate: lmb		CAVenDenburgh		TPGwynn		JLPellet		TPGwynn	
01/2/96		01/2/96		01/19/96		01/19/96		01/21/96	

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

December 21, 1992

MEMORANDUM FOR: M. Wayne Hodges, Director  
Division of Reactor Safety  
Region I

Albert F. Gibson, Director  
Division of Reactor Safety  
Region II

Hubert J. Miller, Director  
Division of Reactor Safety  
Region III

Samuel J. Collins, Director  
Division of Reactor Safety  
Region IV

Kenneth E. Perkins, Director  
Division of Reactor Safety & Projects  
Region V

FROM: Charles E. Rossi, Director  
Division of Reactor Inspection  
and Licensee Performance  
Office of Nuclear Reactor Regulation

SUBJECT: BIENNIAL PROCEDURE REVIEWS

By memoranda dated September 27, 1991, and March 3, 1992, your comments were requested regarding proposed guidance for reviewing licensee-requested changes to quality assurance programs concerning biennial procedure reviews. We have considered your responses and incorporated them, as appropriate, into this memorandum. The purpose of this memorandum is to issue the resulting guidance for reviewing licensee-requested changes in this quality assurance program area. NRC Committee for the Review of Generic Requirements (CRGR) staff member comments have also been incorporated into this guidance.

Licensees typically commit to one of the different versions of ANSI/ANS Standards N18.7 and 3.2. Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operational)," endorses ANSI N18.7-1976/ANS 3.2 and its requirement that "Plant procedures shall be reviewed... no less frequently than every two years." (Section 5.2.15). Each version of the standard states that the frequency of subsequent reviews shall be specified and may vary depending on the complexity of the activity involved and may vary with time as a given plant reaches operational maturity. In addition, each version of the standard requires that applicable procedures be reviewed following a modification to a system and following an unusual incident such as an accident, an unexpected transient, a significant operating error, or an equipment malfunction. These

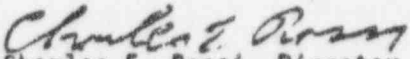
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December 21, 1992

reviews are to determine the adequacy of current procedures and whether changes are necessary or desirable.

It should be noted that the staff is not contemplating a change to the current requirement for biennial review of procedures. RG 1.33 allows the licensees to propose, for staff review and approval prior to implementation, acceptable alternative methods for complying with the biennial review requirement. As such, several licensees have requested NRC approval to change their previous commitments, and NRR has determined that generic guidance for the review of these requests is appropriate. Since changes to the licensee quality assurance programs are normally reviewed by regional staff, NRR is providing the enclosed guidance to use in your review of licensee submittals.

If you have any questions on this position, please contact the NRR QA Section Chief, Anthony Mendiola at (301) 504-1010.

  
Charles E. Rossi, Director  
Division of Reactor Inspection  
and Licensee Performance  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated

## Plant Procedure Review Guidance

Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI N18.7/ANS 3.2 which is endorsed by RG 1.33.

Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.

At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.