



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

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

JUN - 1 1992

Docket Nos. 50-498  
50-499  
License Nos. NPF-76  
NPF-80

Houston Lighting & Power Company  
ATTN: Donald P. Hall, Group  
Vice President, Nuclear  
P.O. Box 1700  
Houston, Texas 77251

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-498/91-21; 50-499/91-21

Thank you for your letter of December 13, 1991, in response to our letter and Notice of Violation dated November 5, 1991. We have reviewed your reply and find your corrective actions for Violations 9121-02 and 9121-03 responsive to the concerns raised in our Notice of Violation. We shall review the implementation of your corrective actions concerning these two violations during a future inspection to determine that full compliance has been achieved and will be maintained.

You stated in your reply that you do not agree with Violation 9121-01 in that the revision of Station Procedure OPGP03-ZS-0005 did not constitute a violation of NRC requirements as described in the Notice of Violation. Your staff provided information to support that position. We have conducted a thorough review of your response but were unable to find any information in your response that would cause us to withdraw the violation. Paragraph 5.6.5 of your PSP states that positive access to vital areas is assured through the use of cardreaders or the utilization of members of the security force. It is NRC's position that utilization of members of the security force means the physical presence of the security officer at the portal.

You noted in your response that Section 4.4.1 of the PSP provides that vital area keys may be issued ". . . to individuals who have been granted unescorted access to areas accessed by these devices, are authorized, and have work related need and are controlled in accordance with security procedures." Your response also states that: "It would be easiest for HL&P to accept the violation and revise the procedure to eliminate issuance of vital area keys to senior managers." We have no argument with issuing vital area keys to authorized personnel. Furthermore, we applaud your initiative that requires senior management personnel tour the plant to observe personnel performance and plant conditions. However, these activities must be conducted in accordance with the requirements of your PSP. If you believe that your PSP places unnecessary restrictions on your senior managers, you have the option of submitting a plan change under 10 CFR Part 50.90 for further consideration by the Office of Nuclear Reactor Regulation.

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PDR ADDCK 05000498  
Q PDR

JEDH

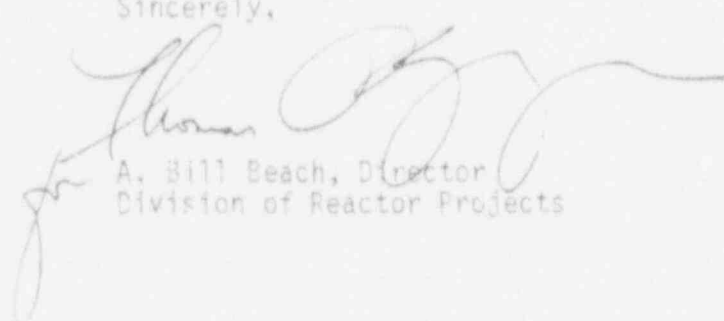
The issuance of vital area keys to station management was discussed during the Technical Security Meeting held at our office on February 21, 1992. In our March 16, 1992 Meeting Summary letter, we stated that our position was that you should comply with your security plan and have a security officer present when locked and alarmed doors are accessed with a hard key.

In summary, changing Procedure OPGPC3-ZS-0005 to allow certain individuals to unlock vital area portals without the presence of a security officer and without a response to the vital area alarm was in violation of your Security and Contingency Plans. Accordingly, we concluded that Violation 9121-01 was a valid citation.

Therefore, since we have decided not to withdraw Violation 9121-01, you are required to respond to this letter and should follow the instructions specified in our November 5, 1991, Notice of Violation. After reviewing your completed response to Violation 9121-01, we will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,



A. Bill Beach, Director  
Division of Reactor Projects

cc:  
Houston Lighting & Power Company  
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City of Austin  
Electric Utility Department  
ATTN: J. C. Lanier/M. B. Lee  
P.O. Box 1088  
Austin, Texas 78767

City Public Service Board  
ATTN: R. J. Costello/M. T. Hardt  
P.O. Box 1771  
San Antonio, Texas 78296

Houston Lighting & Power Company -3-

Newman & Holtzinger, P. C.  
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Central Power and Light Company  
ATTN: D. E. Ward/T. M. Puckett  
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Houston Lighting & Power Company  
ATTN: Rufus S. Scott, Associate  
General Counsel  
P.O. Box 61867  
Houston, Texas 77208

bcc to DMB (IE04)

bcc with portion of licensee's letter:

- Resident Inspector-Of (HL&P)
- Section Chief, DRP/D (W. Jones)
- FIPS File
- MIS System
- RIV File
- Lisa Shea, RM/ALF (MS 4503)
- RSTS Coordinator
- R. Bachmann, OGC (MS 15 B18)
- DRS
- Section Chief, FIPS
- T. W. Dexter, FIPS
- Section Chief, MMIS
- L. J. Callan, DRSS
- R. F. Skelton, MRR/RSGB (MS 9 D24)
- W. J. Tobin, RII
- Project Engineer, DRP/D (A. Howell)
- G. Dick, MRR Project Manager (MS 13 H15)
- R. Erickson, NRR (MS 9 H15)
- C. A. Hackney, SLO
- J. Lieberman, D/OE (MS 7 H5)

*RII	*RIV:FIPS	*C:FIPS	*MRR/RSGB	*D:DRSS	*EO
WJTobin:nh	TWDexter	BMurray	RFSkelton	LdCallan	GFSanborn
/ /92	/ /92	/ /92	/ /92	5/26/92	/ /92
*Previously concurred.					

*[Handwritten signatures and initials]*

*[Handwritten date: 5/26/92]*

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

December 13, 1991

ST-HL-AE-3943

File No.: G02.04

10CFR50

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

South Texas Project Electric Generating Station  
Units 1 and 2

Docket Nos. STN 50-498 and 50-499

Reply to Notices of Violation 9121-01, 9121-02 and 9121-03  
Regarding Issuance of Vital Area Keys, Failure to  
Perform Functional Tests and Failure of  
the Security Diesel Generator to Load Upon Loss of Power

Houston Lighting & Power Company (HL&P) has reviewed Notices of Violation dated November 5, 1991 and submits the attached Reply.

An extension of the due date to December 19, 1991 was requested of and granted by Mr. W. B. Jones on November 27, 1991.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-8434.



D. P. Hall  
Group Vice President,  
Nuclear

RAD/lf

Attachments: 1) Reply to Notice of Violation 9121-01  
2) Reply to Notice of Violation 9121-02  
3) Reply to Notice of Violation 9121-03