

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report Nos. 50-498/92-13
50-499/92-13

Operating License Nos. NPF-76
NPF-80

Licensee: Houston Lighting & Power Company (HL&P)
P.O. Box 1700
Houston, Texas 77251

Facility Name: South Texas Project Electric Generating Station (STP)
Units 1 and 2

Inspection At: STP, Matagorda County, Texas

Inspection Conducted: May 4-8, 1992

Inspector: R. C. Stewart, Reactor Inspector, Materials and Quality Programs
Section, Division of Reactor Safety

Approved: Dwight D. Chamberlain for 6/3/92
I. Barnes, Chief, Materials and Quality Programs Date
Section, Division of Reactor Safety

Inspection Summary

Inspection Conducted May 4-8, 1992 (Report Nos. 50-498/92-13; 50-499/92-13)

Areas Inspected: Routine, unannounced inspection of the quality assurance (QA) audit program and its implementation. In addition, a followup review of previously identified inspection findings was conducted.

Results: Within the areas inspected, no violations or deviations were identified. In general, the licensee's QA program relating to audits appeared to be well structured with organizational responsibilities and functions clearly defined. The inspector observed that audits were scheduled and performed by independent and qualified personnel including technical specialists. The scope of audits was found to be comprehensive and audit findings reflected supportive and meaningful findings. Written responses (when required) appeared to be timely.

DETAILS

1. PERSONS CONTACTED

STP

- *W. Kinsey, Vice President, Nuclear Generation
- *M. Charkravorty, Executive Director, Nuclear Safety Review Board (NSRB)
- *R. Chewing, Vice President, Nuclear Support
- *M. Wisenburg, Plant Manager
- *T. Jordan, General Manager, Nuclear Assurance
- *D. Lazar, Manager, Plant Engineering
- *J. Sharpe, Manager, Maintenance
- *R. Hernandez, Manager, Design Engineering
- *D. Denver, Manager, Nuclear Engineering
- W. Jump, Manager, Nuclear Licensing
- *R. Balcom, Manager, Nuclear Security
- *T. Underwood, Manager, Independent Safety Engineering Group (ISEG)
- R. Rehkugler, Senior Consultant, Quality Assurance (QA)
- *C. Ayala, Supervising Engineer, Licensing
- *R. Dally, Engineering Specialist, Licensing
- *A. McIntyre, Director, Plant Projects
- *H. Bergendahl, Manager, Technical Services
- *R. Pelli, Health Physics Division Manager
- *G. Powell, General Supervisor, Radiation Protection
- *W. Wood, Senior Staff Consultant
- *B. Kruse, Senior QA Specialist
- *A. Khosla, Staff Engineer, ISEG
- *W. Blair, Manager, Staff Training
- *J. Blevins, Supervisor, Procedure Control

NRC

- *R. Evans, Resident Inspector
- *L. Ricketson, Senior Radiation Specialist

Other licensee technical and administrative personnel were contacted during the inspection.

*Denotes the individuals attending the exit interview on May 8, 1992.

2. LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS (92700 and 92702)

2.1 (Closed) Violation (498/8868-07): Audit and surveillance activities were not identifying generic issues. None of the generic issues identified by the NRC inspection team (emergency operating procedure [EOP] inspection) had been identified by quality assurance.

In response to the violation, by letter dated February 14, 1989, the licensee indicated that corrective actions included the review of existing audit scope documents to ensure that they reflected performance and results based auditing. As a result of the document reviews, the licensee determined that six audit scopes required enhancement. In addition, following the completion of the EOP enhancement program (response to Notice of Violation 498/8868-02) the Nuclear Assurance Group would conduct an assessment of the EOPs which would include desk top reviews, plant and control room walkdowns, observation of simulator exercises, and a review of the EOP training program.

During this inspection, the inspector selected for review five audit reports and the written report of the results of the EOP assessment audit referenced above (these documents are listed in the Attachment to this report). In reviewing the audit reports, the inspector verified that the audit planning described the audit scope, and that appropriate technical and quality requirements had been established. The audits demonstrated that a performance and compliance-based auditing approach had been utilized.

The EOP assessment audit, 90-03, conducted during the period November 1990 through February 25, 1991, appeared to be a comprehensive, technically oriented, audit. The objective was to conduct a review of the EOPs focusing on the capability of the procedures to properly guide the operators responses in the event of an accident. The inspector verified that the audit assessment included all areas delineated by the licensee in their letter of response dated February 14, 1989.

This item is considered closed.

2.2 (Closed) Licensee Event Report (LER) 91-002: This LER addressed a Technical Specification violation that resulted from the failure to perform a required ASME Section XI post maintenance hydrostatic pressure test. On January 31, 1992, during a review of a completed work package for welding repairs completed on the Unit 2 turbine-driven auxiliary feedwater pump steam supply line, an engineer discovered that, although an operational leak check was performed following completion of the work on December 5, 1990, the required ASME Section XI hydrostatic pressure test was not performed.

The licensee determined that the root causes of this oversight were less than adequate procedural controls, less than adequate review of revised work packages, and less than adequate review of post maintenance test requirements.

Corrective actions initiated by the licensee included the satisfactory performance of the Section XI Code pressure test on February 2, 1992, revisions to the applicable ASME Section XI repair and test procedures, and performance of training for the appropriate maintenance planners and system engineers. During this inspection, the inspector reviewed the licensee's documented records relative to the above corrective actions and verified that all corrective action commitments were completed.

This item is considered closed.

3. AUDIT PROGRAM (40702 and 40704)

The objective of this inspection was to verify that the licensee had developed and implemented a quality assurance (QA) audit program that was in conformance with the Technical Specifications (TS), regulatory requirements, and commitments in the Updated Safety Analysis Report (USAR).

3.1 Organization and Program Verification

The licensee's QA organization reported to the General Manager, Nuclear Assurance, and included the Director, QA, and five supervisors responsible for specific functional areas including audits.

The inspector reviewed the following program documents to verify that administrative controls existed to assure that audits were properly scheduled and performed by independent and qualified personnel: Interdepartmental Procedure IP-4.04Q, "Performance of QA Audits and Surveillance Activities," Revision 4; Operations QA Plan Chapter 15.0, "QA Audit and Surveillance," Revision 4; and QA Procedure QAP-2.8, "Plant and Vendor Audits," Revision 5. The inspector found that the licensee's audit program appropriately defined organizational structure, functional responsibilities, levels of authority and channels of management communication, and was consistent with TS and regulatory requirements, and USAR commitments.

3.2 Implementation Verification

The inspector reviewed the licensee's audit planning and scheduling documents in conjunction with the TS requirements prescribed in Section 6.5.2.8. The inspector observed that audits were scheduled and conducted on an annual frequency and were consistent with the TS requirements. The inspector selected five completed audit reports and an augmented special assessment EOP audit (see listing in the Attachment to this report). The audit reports were selectively reviewed by the inspector with respect to the adequacy of audit scope and content, quality and timeliness of responses to audit findings, and audit personnel qualifications. The inspector observed that schedules and scope of audits were found to be in conformance with TS requirements, comprehensive, and contained supportive and meaningful findings. Written responses to findings were observed to be timely. Auditors and technical specialists selected for auditing assignments were noted to have the training or experience commensurate with the scope, complexity, or special nature of the activity being audited. The auditing group appeared to be adequately staffed, with technical specialists from other nuclear facilities also being utilized as audit team members. The STP QA audit program was found, in general, to be well organized, managed, and implemented, and in conformance with TS, USAR commitments, and industry guides and standards.

4. EXIT INTERVIEW

An exit interview was conducted on May 6, 1992, with those personnel denoted in paragraph 1 in which the inspection findings were summarized. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspector during this inspection.

ATTACHMENT

Procedures

QAP-2.8, "Plant and Vendor Audits," Revision 5

IP-4.04Q, "Performance of Quality Assurance Audits and Surveillance Activities," Revision 4

IP-4.11Q, "Quality Verification Deficiency Reporting," Revision 1

Audit Reports

91-19(CA), Corrective Actions

92-01(PO), Plant Operations

92-02(MM), Maintenance Activities

92-04(TE), Testing

92-03(RC), Radiological Controls

90-03, Special EOP Assessment Audit

Other Documents Reviewed

Operations Quality Assurance Plan, Chapter 15, "Quality Assurance Audit and Surveillance," Revision 4

STP Nuclear Assurance Department Chart STP-0-0554A, Revision 1, dated March 31, 1992

Nuclear Assurance Station Audit Plan and Schedule for 1992, Revision 0, dated December 31, 1991

Nuclear Assurance Station Audit Schedule for Second Quarter of 1992, Revision 1, dated April 16, 1992

Quality Assurance Station Audit Plan for 1991, Revision 2, dated January 13, 1992

Auditors Certifications and Qualifications, dated May 6, 1992

STPEGS Technical Specifications, Section 6.5.2.8

File Folder, Item 8868-07

File Folder, Item LER 91-002