



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 2, 1996

LICENSEE: HOUSTON LIGHTING AND POWER COMPANY (HL & P), et al.
FACILITY: South Texas Project, Units 1 and 2 (STP)
SUBJECT: SUMMARY OF DECEMBER 7 AND 8, 1995, MEETINGS ON GRADED QUALITY ASSURANCE (GQA)

On December 7 and 8, 1995, the NRC staff met with the South Texas licensee for an update on the licensee's progress in their GQA implementation methodology. Meeting attendees are listed in Attachment 1. The handouts provided by the licensee are in Attachment 2.

The licensee's presentation included a discussion of their updated draft procedures in the areas of program description, design and modification control, procurement, risk management, basic program attributes, probabilistic safety assessment (PSA) program (including configuration control and related risk ranking), and station performance data collection, categorization and reporting. The licensee presentation also included a discussion of their draft software specifications for performance reporting and identification, a table of risk ranking values for basic events, and a figure showing the number of components in the high, medium and low risk categories.

The licensee commented that performance monitoring will be done at the component level and that the performance weighting factors are still being developed. The licensee commented that the figure showing the number of components in the various risk categories shows that, based on sensitivity studies, component rankings were not significantly affected by maintenance unavailability, operator recovery, common cause, and uncertainty bounds. In response to staff questions, the licensee added that fire and seismic events are included in the ranking, however, a shutdown PSA has not been done and is not part of the ranking process. Also, large early release frequency (LERF) ranking has not yet been performed.

The staff provided comments on the information provided by the licensee. The staff noted that per the licensee's latest draft procedures, the only way that a component can be put in the full quality assurance (QA) program scope is for it to be ranked high by risk ranking, where both the Fussel-Vessely (FV) and Risk Achievement Worth (RAW) criteria are exceeded. The staff reiterated its suggestion of the previous meeting, which is that if either the FV or RAW criteria is exceeded, the component's risk would be ranked high. The staff also commented that the wording in Step 1 of the Comprehensive Risk Management Procedure (Figure 2) should be expanded in scope so that criteria other than risk ranking will be considered when determining which components are in the full QA program scope category (i.e., for components that are deterministically important, are maintenance rule significant, have directly caused an initiating event, or would otherwise be excluded due to PSA model limitations). The staff also suggested that the deterministic considerations be rigorously accounted for using well defined criteria or parameters that are supportable. The licensee indicated that ANSI N45.2.11 provides a set of

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deterministic questions that could be utilized. The staff also suggested that a look at success path combinations might be useful in identifying components that would ensure mitigation of core damage.

During the discussion related to QA topics, the licensee affirmed that they have software QA procedures that will be applied to the PSA model in the future. Additionally they have ascertained that the vendor who supplied the PSA program (RISKMAN-PLG) to STP has a QA program and that the PSA model was developed under an Appendix B QA program. The licensee clarified that in regards to both their expert panel and work group composition, that the PRA expert will have to be present to form a quorum.

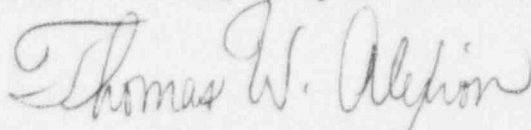
With respect to the new QA categories, the licensee indicated that the master equipment data base will be modified to include a component designation to identify whether the item will be categorized as full, targeted, or basic QA program. When questioned as to how particular types of components might be categorized, the licensee clarified that ASME and environmentally qualified equipment will be categorized to receive either the targeted program or full programs.

The staff asked several questions with respect to the draft applicability matrices appended to the selected draft operations QA plan chapters. In some instances, the matrices implied that the basic program would not implement provisions associated with other regulatory requirements such as 10 CFR Section 50.59 and Part 21. The licensee affirmed that all regulatory requirements will be fulfilled by the basic program and that the matrices would be amended as necessary to reflect that fact. Further in Operations QA Plan Chapter 2, Section 3.3, the licensee provided a clarification that the basic program may not necessarily reflect controls delineated in NRC Regulatory Guides, but that when warranted the basic program would continue to implement provisions of the regulatory guides.

The licensee's current plan is to formally submit their GQA program for NRC review in mid-January, 1996. The licensee indicated that the GQA program change will be submitted as a no-reduction in commitment change and that they would like to receive a written staff response to the submittal. The staff agreed to provide such a response and indicated that it would include the necessary evaluations of both QA and PSA GQA aspects. There was some discussion about which regulatory guides provide generic relief and which regulatory guide commitments may need to be revised to account for new implementation practices in the basic program area. The staff reminded the licensee that QA program changes that constitute a reduction in commitment would have to be submitted in accordance with 50.54(a) and would receive an expedited review. The staff has subsequently concluded that 50.54(a) scope of applicability includes Final Safety Analysis Report (FSAR) content that relates to QA programmatic information that was originally relied upon to license the facility (such as QA regulatory guide commitments that may reside in other chapters of the FSAR).

The licensee suggested that an appropriate time for NRC to observe the working panel would be in late-February, 1996. The licensee also mentioned that they will provide NRC with the resumes of the individuals in the expert panel.

The staff thanked the licensee for the meeting, indicated that it was useful in keeping the staff current with the licensee's progress in their GQA implementation methodology, and anticipates that further interaction with the licensee will be needed during the review of the GQA program submittal.



Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Attachments: 1. List of Meeting Attendees
2. Meeting Handouts

cc w/atts: See next page

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DISTRIBUTION: Meeting on December 7-8, 1995

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MEETING BETWEEN HL&P AND NRC ON GRADED QUALITY ASSURANCE

December 7-8, 1995

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ATTACHMENT 1