

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20665

June 10, 1992

Docket Nos. 505489 and 50-499

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

Dear Mr. Hall:

SUBJECT: SOUTH TEXAS PROJECT UNITS 1 AND 2 - CHANGE IN EMERGENCY RESPONSE ORGANIZATION MINIMUM STAFFING (TAC NOS. M82784 AND M82785)

By letter dated February 10, 1992, Houston Lighting and Power Company requested approval under 10 CFR 50.54(q) for a proposed change in the minimum staffing levels specified in the Emergency Plan functional area of radiological accident assessment and support of operational accident assessment. The proposed change would reduce the number of on-shift personnel from 5 to 3, with an additional 3 members available within 45 minutes. Currently, in Revision 13, the most recent approved version of the Emergency Plan, the onsite personnel in the radiological accident assessment area consists of one Radiation Protection (RP) Tech Supervisor and five RP technicians.

The proposed on-shift staffing will include one senior Health Physics (HP) individual available to perform initial dose assessment and two technicians qualified in radiation protection to conduct onsite surveys. The licensee has committed to have 3 additional technicians available within 45 minutes. Although the proposal results in a staffing reduction from the current requirements, the initial coverage proposed (one senior HP individual and two technicians) exceeds the guidance in NUREG-N654, "Criteria for Preparation and Evaluation of Radiological E ergency Response Plans and Preparedness in Support of Nuclear Power Plants" and NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements." The proposal to provide addicional staffing within 45 minutes is longer than that of 30 minutes for full staffing which is recommended in the above guidance. However, the 15 minute delay, until the additional technicians arrive, is considered acceptable since the initial onsite staff is adequate to respond during the early phases of an accident.

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Mr. Donald P. Hall

The staff has concluded, based upon our review and evaluation, that the revised emergency plan as submitted in the February 10, 1992, letter meets the standards of 10 CFR 50.47(b)(2) and is acceptable.

Sincerely,

Original signed by

Suzanne C. Black, Director Project Directorate IV-2 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

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Mr. Donald P. Hall

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