#### APPENDIX

# U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report Nos. 50-498/92-23; 50-499/92-23

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 (STP)

Inspection at: STP, Matagorda County, Texas

Inspection Conducted: July 13-17, 1992

Inspector: M. E. Murphy, Reactor Inspector, Test Programs Section, Division

of Reactor Safety

Approved:

. E./Gagliardo, Chief, Test Programs Section

Division of Reactor Safety

Date

Inspection Summary

Inspection Conducted July 13-17, 1992 (Report 50-498/92-23)

Areas Inspected: No inspection was performed for Unit 1.

Inspection Conducted July 13-17, 1992 (Report 50-499/92-23)

<u>Areas Inspected</u>: Routine, announced inspection of the licensee's modification testing program and followup of actions taken on previous inspection findings.

Results: The licensee had a very good, comprehensive program for identifying and implementing post-modification testing activities. The licensee's procedure that provides the engineers guidelines in the various categories of modifications and definitive selection of the appropriate type and level of testing is considered a strength in the program.

The following previously identified inspection findings were dispositioned as indicated:

o (OPEN) Open Item 498/8928-01; 499/8928-01

(CLOSED) Inspector Followup Item 498/9107-03; 499/9107-03

### DETAILS

### PERSONS CONTACTED

#### HL&P

\*C. Ayala, Supervising Engineer, Licensing

\*J. Beers, Senior Consulting Engineer, Design Engineering \*M. Berg, Division Manager, Design Engineering

\*H. Bergendahl, Manager, Technical Services J. Blevins, Supervisor, Procedure Control

\*M. Chakravorty, Executive Director, Nuclear Engineering Review Board

D. Chamberlain, Supervisor, Programs and Procedures \*R. Dolly-Piggott, Engineering Specialist, Licensing C. Gonzalez, System Engineer, Plant Engineering

R. Hamilton, Operations Support Supervisor \*R. Hernandez, Manager, Design Engineering

\*W. Humble, Manager, Plant Programs

J. Johnson, Supervisor, Nuclear Assurance \*T. Jordan, General Manager, Nuclear Assurance \*W. Jump, General Manager, Nuclear Licensing \*W. Kinsey, Vice President, Nuclear Generation \*D. Leazar, Manager, Plant Engineering

\*M. Ludwig, Administrator, Participant Services \*T. Meinicke, Senior Staff Consultant, R&P \*A. McIntyre, Director, Plant Programs

B. Mower, Design Engineer, Engineering Support

K. Richards, Division Manager, Electrical Maintenance

\*W. Wood, Senior Staff Consultant, P&A

#### NRC

\*R. Evans, Resident Inspector

J. Tapia, Senior Resident Inspector

The inspector also contacted other licensee personnel during the inspection.

\*Denotes those attending the exit meeting on July 17, 1992.

## FOLLOWUP ON PREVIOUS INSPECTION FINDINGS (92701)

2.1 (OPEN) Open Item (498/8928-01; 499/8928-01): Licensee's procedures did not address the administrative controls necessary to incorporate revised data sheets into the test results during the review process.

The licensee's planned action was to provide sufficient , dministrative controls to address incorporation of revised data sheets into the test results during the review process. The licensee's action to date was to issue a new procedure, IP1.910, "Conduct of Tests or Evolutions Requiring Additiona?

Controls." This procedure did provide controls for revised or additional data sheets being added to a test package. However, this procedure was limited in that it only covered uniquely defined procedures. The inspector was informed that additional information on this issue would be provided at a later date.

This item will remain open pending the licensee's completion of their planned actions.

2.2 (CLOS(D) In record Followup Item (498/9107-03; 4999207-03): The licenses's precedures lacked administrative controls for disposition of obsolete design basis engineering calculations.

The licensee conducted a comprehensive review of existing calculations in all engineering disciplines. This review identified those calculations which did not support the current design basis. Those identified calculations have been voided. To preclude future problems, the licensee issued Revision 4 to Procedure OEP-3.07Q, "Preparation of Engineering Calculations," dated December 31, 1991. This revision incorporated, as a general requirement, that design calculations which are no longer required to support design activities are to be voided.

This item is closed.

## 3. MODIFICATION TESTING (72701)

This portion of the inspection was conducted to determine that the licensee's modification testing program for new or modified structures, systems, and components was in conformance with the detailed design documentation, regulatory requirements, Technical Specifications, and industry approved codes and standards. The inspector reviewed the following licensee modification program administrative procedures:

- OPGP03-ZE-0031, "Design Change Implementation," Revision 8, dated January 29, 1992
- OPEPOI-ZA-0007, "Post Modification Acceptance Testing Guidelines," Revision O, dated March 2, 1992
- o IP-3.01Q, "Plant Modifications," Revision 7, dated January 2, 1991
- IP-1.91Q, "Conduct of Tests or Evolutions Requiring Additional Controls," Revision O, dated February 1, 1992
- OEP 3.05Q, "Preparation of Design Package for Modifications," Revision 7, dated June 1, 1992
- OEP 6.030, "Design Document Change Control," Revision 7, dated October 9, 1991

The review determined that the licensee's program was comprehensive, addressed the different modification categories, and provided guidance for testing that was consistent with the category of modification. The program also provided acceptable definitions for testing during the various phases of the modification process.

Overall retest assessment and management oversight was assured by the assignment of specific areas of responsibilities to upper level management. The plant manager was responsible for the performance of post-modification testing. The design engineering manager was responsible for identifying acceptance test criteria for critical parameters. Responsibility for the development of post-modification test instructions and/or procedures was assigned to the manager of plant engineering. Reviews and inspections of modification testing was the responsibility of the general manager of nuclear assurance.

Procedure OPEPO1-ZA-0007, "Post-Modification Acceptance Testing Guidelines," was considered to be a definite strength to the post-modification test program. This procedure provided the engineer with comprehensive test definitions and irsights for the determination and selection of appropriate post-modification tests. The design change type descriptions and testing matrix was considered an excellent tool for identifying and assigning appropriate testing requirements.

The inspector reviewed the following design change packages for Unit 2:

- o 88012, "Eliminate Spray Additive Tanks, Add TSP Baskets"
- 91018, "RPV Venting and RCS Degassing Paths"
- 89016, "Modification to ERFDADS Datalinks with QDPS and RMS"
- o 89020, "ERFDADS Graphic Display Package"
- o 89022, "Modify QDPS to Resolve Human Engineering Discrepancies"
- o 89094, "Modify Reactor Makeup Pump Piping"
- o 90067, "Shot Peening of Steam Generator Tubes"
- o 89114, "Install Piping/Manifolds Required to Support ILRT"

This review determined that the modification work packages conformed to the administrative procedure requirements. The test instructions or procedures contained acceptable statements of scope, objectives, limitations, precautions, prerequisites, and acceptance criteria. Provisions for work signoff, system restoration, and release to operations were incorporated into the package. The licensee's review and evaluation of completed tests confirmed that test results met the established acceptance criteria, or

identified test deviations were resolved, and the required retests were performed prior to releasing the system or component to operations.

## 4. EXIT MEETING

An exit meeting was conducted with the licensee personnel identified in paragraph 1 on July 17, 1992. During the meeting, the inspector reviewed the scope and findings of the inspection. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspector.