



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

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

SEP 22 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: LICENSEE RESPONSE TO NOTICE OF VIOLATION (NRC INSPECTION REPORT  
NOS. 50-498/92-07; 50-499/92-07)

Thank you for your letters dated May 1 and June 30, 1992. The May letter submitted information in response to the February 10, 1992, 10 CFR Part 2.206 petition and the June letter responded to our letter and the enclosed Notice of Violation dated June 1, 1992. We have reviewed the corrective actions that Houston Lighting & Power Company has taken, as outlined in the Attachment to the June 30, 1992, letter, and we find those corrective actions to be responsive to the specific issues cited in the Notice of Violation. As a result of our review, however, we found that clarification of certain issues was warranted, as discussed with Mr. W. Jump during a telephonic call on August 20, 1992.

Additional information about these issues is provided in the Attachment to this letter. No additional response is required for these issues, at this time.

Our routine inspection program will review the effectiveness of your corrective actions. Should you have further questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

  
James L. Milhoan  
Regional Administrator

Attachment: (as stated)

cc w/Attachment: (see next page)

9209280119 920922  
PDR ADOCK C300049B  
P PDR

IE01  
1/1

Houston Lighting & Power Company

-2-

cc w/Attachment:  
Houston Lighting & Power Company  
ATTN: William J. Jump, Manager  
Nuclear Licensing  
P.O. Box 289  
Wadsworth, Texas 77483

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 78297

Newman & Holtzinger, P. C.  
ATTN: Jack R. Newman, Esq.  
1615 L Street, NW  
Washington, D.C. 20036

Central Power and Light Company  
ATTN: D. E. Ward/T. M. Puckett  
P.O. Box 2121  
Corpus Christi, Texas 78403

INPO  
Records Center  
1100 Circle 75 Parkway  
Atlanta, Georgia 30339-3064

Mr. Joseph M. Hendrie  
50 Bellport Lane  
Bellport, New York 11713

Bureau of Radiation Control  
State of Texas  
1101 West 49th Street  
Austin, Texas 78756

Judge, Matagorda County  
Matagorda County Courthouse  
1700 Seventh Street  
Bay City, Texas 77414

Houston Lighting & Power Company

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Licensing Representative  
Houston Lighting & Power Company  
Suite 610  
Three Metro Center  
Bethesda, Maryland 20814

Houston Lighting & Power Company  
ATTN: Rufus S. Scoti, Associate  
General Counsel  
P.O. Box 61867  
Houston, Texas 77208

bcc to DMB: (IE01)

bcc w/Attachment distrib. by RIV:  
 J. L. Milhoan  
 DRP  
 Lisa Shea, RM/ALF, MS: MNBB 4503  
 DRSS-FIPS  
 Project Engineer (DRP/D)  
 DRS  
 Chief, Technical Support Section  
 J. Gagliardo  
 L. Williamson

Resident Inspector  
 Section Chief (DRP/D)  
 MIS System  
 RSTS Operator  
 RIV File  
 R. Bachmann, OGC, MS: 15-B-18  
 D. Powers  
 T. Dexter  
 RIV Allegation Coordinator

|              |            |             |          |          |
|--------------|------------|-------------|----------|----------|
| RIV:OPS:SRI* | SPSS:FIPS* | C:TPS*      | C:FIPS*  | D:DRSS*  |
| DAPowers/lb  | TWDexter   | JEGagliardo | BMurray  | LJCallan |
| 08/07/92     | 08/07/92   | 08/07/92    | 08/10/92 | 08/18/92 |

|                            |                       |           |                       |                    |
|----------------------------|-----------------------|-----------|-----------------------|--------------------|
| D:DRP *                    | EO <i>[Signature]</i> | D:DRS     | DR <i>[Signature]</i> | <i>[Signature]</i> |
| ABBeach <i>[Signature]</i> | GSapborn              | SJCollins | JMMontgomery          | JMilhoan           |
| 08/18/92                   | 8/18/92               | 9/18/92   | 9/18/92               | 9/18/92            |

\*Previously concurred

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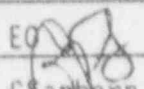
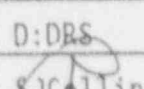
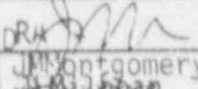

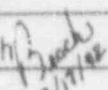
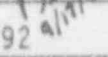
bcc to DMB: (IE01)

bcc w/Attachment distrib. by RIV:

J. L. Milhoan  
 DRP  
 Lisa Shea, RM/ALF, MS: MNBB 4503  
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 Project Engineer (DRP/D)  
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|--|--|---|---|---|
| D:DRP *  | EO  | D:DRS  | DRM  |  |
| ABBeach   | GSarborn   | SJCollins   | JMontgomery<br><del>JL Milhoan</del>  | JLMilhoan   |
| 08/18/92  | 8/18/92  | 9/18/92   | 9/18/92   | 9/18/92   |

\*Previously concurred

## ATTACHMENT

The NRC letter dated June 1, 1992, transmitted NRC Inspection Report 50-498/92-07; 50-499/92-07 and an enclosed Notice of Violation. Houston Lighting & Power Company (HL&P) responded to the Notice of Violation by letter dated June 30, 1992. This Attachment provides clarification of issues contained in the HL&P response letter and the NRC inspection report, which provided the results of a special followup team inspection at South Texas Project Electric Generating Station (STP) that gathered and assessed specific and programmatic information related to issues identified in a 10 CFR Part 2.206 Petition dated February 10, 1992.

### 1. Concern Related to Lax Attitude

The inspection report related the presence of a lax attitude that had been exhibited by certain maintenance workers and security officers at STP toward ensuring compliance with visitor escort procedures. The determination of the presence of a lax attitude was not only an NRC inspection team finding, but was also later confirmed by the security manager in his April 14, 1992, presentation of corrective actions to the NRC inspection team.

### 2. Concern Related to Timely Corrective Actions

The inspection report related the lack of timely corrective actions taken by HL&P in response to the notification of the apparent violations by the petitioner, the news media, and the NRC inspection team.

On March 13, 1992, at the NRC inspection team's request, a meeting was held with HL&P's security manager and other licensee representatives. At the meeting, the team discussed that it had determined that visitor escort control had apparently been violated on occasion by several plant workers in the early portion of 1992. In particular, the NRC inspection team members stated that they had obtained admissions from workers, who had served as escorts, that they had left visitors unattended within the protected area for short periods. Also at that time, the NRC informed HL&P staff of other security problems (e.g., some escorts and security personnel had allowed visitors to notify security of their transfers to other escorts).

In a March 25, 1992, briefing with the NRC inspection team leader and HL&P representatives, the security manager stated that he was not convinced that an escort problem had occurred. Later, however, at a subsequent March 27, 1992, briefing and again at the management conference on April 14, 1992, the security manager acknowledged that a procedural noncompliance had occurred. The HL&P June 30, 1992, response to the Notice of Violation concurred that the violations occurred.

### 3. Clarifications Related to HL&P Response Letter

HL&P's June 30, 1992, letter warrants the followings clarifications:

- a. HL&P's letter stated, "The understanding from the March briefing from NRC inspectors was that an apparent violation of visitor escort requirements due to training deficiencies existed."
- (1) Our inspectors did not know the root cause(s) of the apparent violation. In particular, with one exception, the NRC inspection team did not have any critical comments about the training given to security officers and this exception was not determined by the NRC inspection team until after the March briefing.
- b. HL&P's letter stated, "During the formal NRC exit meeting in April, our management became aware of information from NRC interviews with plant personnel wherein a number of significant actual visitor control deficiencies were evidently occurring."
- (1) The meeting referred to in the statement given above was the management conference conducted on April 14, 1992, not the subsequent formal NRC exit meeting conducted on April 14, 1992.
  - (2) The security manager and other HL&P representatives were previously informed by the inspection team on March 13, 1992, that visitors had been left unattended. The NRC inspection team subsequently expected the licensee's representatives to evaluate this information and provide for notification to other HL&P managers, as appropriate, within the licensee's organization. Apparently, however, that information was not conveyed to senior management.
  - (3) The NRC inspection team did not identify any visitor escort violations that "were . . . occurring," but rather did identify that such violations had occurred based on interviews. The NRC inspection team had no evidence of continuing violations during its presence on site.