

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

October 27, 1992

ST-HL-AE-4245

File No.: G25

10CFR50

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Attention: Mr. James L. Milhoan
Regional Administrator
NRC, Region IV

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Initial Systematic Assessment
of Licensee Performance (SALP) Report

Reference: Letter from James L. Milhoan to D. P. Hall dated
October 2, 1992 (ST-AE-HL-93197)

Dear Mr. Milhoan:

Houston Lighting & Power Company (HL&P) has reviewed the initial SALP Report for the South Texas Project (STP) and determined that it describes station performance; however, two clarifying items appear appropriate. Although these items concerning the Nuclear Security and Design Engineering organizations adjust data in the letter, none of the clarifications are expected to affect the NRC conclusions.

HL&P recognizes the need to vigorously address issues raised in the report, and is concerned about the decline in performance. The NRC noted in the public meeting of October 13, 1992, that HL&P has good programs in areas such as maintenance, self-assessment, corrective action, and quality assurance. We are committed to improving the implementation of programs such as these in order to enhance overall station performance in any review forum.

HL&P is reviewing the issues presented in the SALP Report and will provide you with a description of corrective action by November 25, 1992. This will build on the basic soundness of the current STP programs and aggressively address the quality of their execution and achievement of results.

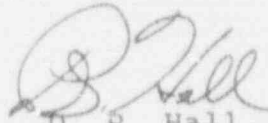
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HL&P appreciates the insights provided by the NRC over the SALP period. We are confident that we can maintain the area of superior performance and improve in those areas found to be good or acceptable.



D. P. Hall
Group Vice President,
Nuclear

AWH/ag

Attachment: Comments on SALP Report

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CC:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
c/o U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

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

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
P.O. Box 1088
Austin, TX 78767

K. J. Fiedler/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61867
Houston, TX 77208

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30239-3064

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

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Comments on SALP Report

1. On page 15, the report states that, "A noticeable decline was identified regarding security systems performance early in the assessment period when the two security staff positions designated for testing security systems were eliminated. These two positions were later reinstated during the assessment period and a marked improvement was noted with the operability of the Security Systems."

Comment: The two security staff positions designated for testing security systems were reinstated in February of 1992. The marked improvement in the operability of the Security Systems noted in the report began several months later, following other actions including the Nuclear Security Department reorganization in May of 1992. Since the May reorganization, the need for compensatory posting for Security System problems has been reduced.

2. On page 16, the report states that, "Twenty-nine new security officers were hired near the end of the assessment period and were attending initial security training."

Comment: The security organization did not hire twenty-nine new security officers near the end of the assessment period as indicated in the report. The training referred to in the report was a class of twenty-nine unarmed security officers who were attending armed security officer training. These individuals had been hired early in the period to provide coverage while the Maintenance Operations Facility was removed from the Protected Area for renovation. The officers were retained and upgraded to armed officers following completion of the renovation.

3. The quality engineering group within Design Engineering mentioned on page 18 of the SALP report has been eliminated since the NRC review. The assessments of Design Engineering performed formerly by this group are incorporated within other STP organizations, primarily in Quality Assurance and the Independent Safety Engineering Group.