

MAR 22 1988

In Reply Refer To:  
Dockets: 50-498/87-77  
50-499/87-77

Houston Lighting & Power Company  
ATTN: J. H. Goldberg, Group Vice  
President, Nuclear  
P.O. Box 1700  
Houston, Texas 77001

Gentlemen:

Thank you for your letter of February 26, 1988, in response to our letter and Notice of Deviation dated January 27, 1988. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Deviation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By  
L. J. Callan

L. J. Callan, Director  
Division of Reactor Projects

cc:  
Houston Lighting & Power Company  
ATTN: M. A. McBurnett, Manager  
Operations Support Licensing  
P.O. Box 289  
Wadsworth, Texas 77483

Houston Lighting & Power Company  
ATTN: Gerald E. Vaughn, Vice President  
Nuclear Operations  
P.O. Box 1700  
Houston, Texas 77001

C:OPS JEGaguardo:cs 3/17/88  
D:DRS JLMilhoan 3/21/88

C:PSD GLConstable 3/21/88

D:DRS LJCallan 3/24/88

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Houston Lighting & Power  
Company

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Houston Lighting & Power Company  
ATTN: S. L. Rosen  
P.O. Box 289  
Wadsworth, Texas 77483

Central Power & Light Company  
ATTN: R. L. Range/R. P. Varret  
P.O. Box 2121  
Corpus Christi, Texas 78403

City Public Service Board  
ATTN: R. J. Costello/M. F. Hardt  
P.O. Box 1771  
San Antonio, Texas 78296

City of Austin Electric Utility  
ATTN: R. J. Miner, Chief Operating  
Officer  
721 Barton Springs Road  
Austin, Texas 78704

Texas Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:

DRP

R. D. Martin, RA

Section Chief (DRP/D)

MIS System

Lisa Shea, RM/ALF

R. Bachmann, OGC

P. Kadambi, NRR Project Manager

TSS

RRI-OPS

DRS

RPSB-DRSS

RIV File

RSTS Operator

D. Hunnicutt

R. Hall

D. Powers

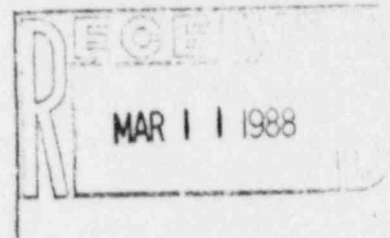
# The Light company

Houston Lighting & Power

P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

February 26, 1988  
ST-HL-AE-2532  
File No.: G2.04  
10CFR Part 2

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



South Texas Project Electric Generating Station  
Unit 1  
Docket No. 50-498  
Response to Deviations  
Included in Inspection Report 87-77

HL&P was reviewed the Notice of Deviations included in Inspection Report 87-77 and submits the attached response pursuant to 10CFR Part 2, Appendix C.

In addition, we have addressed your concerns relative to the Licensing Comment Tracking System in Attachment B. If you have any questions on this subject, please contact S. M. Head at (512) 972-8392.

A handwritten signature in cursive script, appearing to read "G. E. Vaughn".

G. E. Vaughn  
Vice President  
Nuclear Plant Operations

GEV/SMH/lis

Attachment A: Response to Notice of Deviations  
Included in Inspection Report 87-77

Attachment B: Response to NRC Concern Relative to  
the Adequacy of the HL&P Licensing  
Commitment Tracking System

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Houston Lighting & Power Company

ST-HL-AE-2532  
File No.: G2.04  
Page 2

cc:

Regional Administrator, Region IV  
Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

N. Prasad Kadambi, Project Manager  
U. S. Nuclear Regulatory Commission  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 20859

Dan R. Carpenter  
Senior Resident Inspector/Operations  
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

R. L. Range/R. P. Verret  
Central Power & Light Company  
P. O. Box 2121  
Corpus Christi, TX 78403

R. John Miner (2 copies)  
Chief Operating Officer  
City of Austin Electric Utility  
721 Barton Springs Road  
Austin, TX 78704

R. J. Costello/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 1700  
Houston, TX 77001

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

Attachment A  
Response to Notice of Deviation  
From Inspection Report 87-77  
(Page 1 of 6)

- Reference 1) Letter from J. H. Goldberg to Document Control Desk Dated July 15, 1987 (ST-HL-AE-2298)
- Reference 2) Letter from G. E. Vaughn to Document Control Desk Dated December 31, 1987 (ST-HL-AE-2467)

Deviation A.1

A.1.I Statement of Deviation

In a letter (ST-HL-AE-2298), dated July 15, 1987, to the NRC, the licensee responded to the findings of the operational readiness inspection of June 29 through July 2, 1987, and the observations discussed during the exit interview on July 2, 1987. The following deviation from the commitment stated in the July 15, 1987, letter was identified:

In response to Observation No. 4, the licensee stated that, "WCC activities are currently included in maintenance audit plans."

In deviation from the above, the NRC inspector found on December 15, 1987, that the current maintenance audit plan, "Audit D3, Maintenance Activities," dated July 13, 1987, did not contain provisions for a review of WCC activities, and the operations QA manager stated that he had never intended to audit WCC activities.

A.1.II Reason for Deviation

The intent of HL&P commitment was that quality related maintenance activities that could be affected by the Work Control Center (WCC) are included in the maintenance audit plans. The statement was not intended to imply that Nuclear Assurance would audit the WCC specifically.

As discussed in Reference 2, audits and an assessment have been performed which included within their scope the activities of the WCC and the Daily Work Activity Schedule process. We believe that this type of review by Nuclear Assurance fulfills the intent of the commitment made by HL&P in Reference 1, and as such a deviation does not exist.

Since audits of WCC activities have occurred, the statement made by the QA manager was addressing the fact that he did not plan to audit the WCC specifically.

Attachment A  
Response to Notice of Deviation  
From Inspection Report 87-77  
(Page 2 of 6)

Deviation A.1 (Cont.)

A.1.III Corrective Actions That Have Been Taken

Not applicable

A.1.IV Corrective Actions That Will Be Taken

Not applicable

A.1.V Date When Full Compliance Will Be Achieved

STPEGS is in full compliance at this time.

Attachment A  
Response to Notice of Deviation  
From Inspection Report 87-77  
(Page 3 of 6)

Deviation A.2

A.2.I. Statement of Deviation

In a letter (ST-HL-AE-2298), dated July 15, 1987, to the NRC, the licensee responded to the findings of the operational readiness inspection of June 29 through July 2, 1987, and the observations discussed during the exit interview on July 2, 1987. The following deviation from the commitments stated in the July 15, 1987, letter was identified:

In response to Observation No. 14, the licensee stated that, "Since the LCO log sheet may not be visible to the other licensed operators in the control room, HL&P will also require entries in the unit supervisor and control room logs of entry into an LCO and exit from an LCO."

In deviation from the above, Control Room Procedure OPSP03-ZQ-0001, which had been last revised (Revision 1) on July 31, 1987, required only that the unit supervisor log record entries of the plant's entry into an LCO and exit from an LCO. The NRC inspector also found on December 15, 1987, that the control room log did not contain entries of LCO status.

A.2.II. Reason for Deviation

The reason for this deviation is that the responsible department failed to completely implement the commitment.

A.2.III. Corrective Actions That Have Been Taken

A procedure change was issued to OPOP03-ZQ-0030 "Maintenance of Plant Operations Logbooks" on December 16 requiring entries in the reactor operators logbook (control room log).

To address the root cause and generic implications of this deviation, please see Attachment B.

A.2.IV Corrective Actions To Be Taken

No additional corrective actions are considered necessary.

A.2.V. Date When Full Compliance Will Be Achieved

STPEGS is in full compliance at this time.



Attachment A  
Response to Notice of Deviation  
From Inspection Report 87-77  
(Page 4 of 6)

Deviation A.3

I. Statement of Deviation

In a letter (ST-HL-AE-2298), dated July 15, 1987, to the NRC, the licensee responded to the findings of the operational readiness inspection of June 29 through July 2, 1987, and the observations discussed during the exit interview on July 2, 1987. The following deviation from the commitment stated in the July 15, 1987, letter was identified:

In response to Observation No. 35, the licensee stated that, "A procedure will be written which specifies actions to be taken as a result of ISEG reports. This procedure will be completed by September 30, 1987. As an interim measure, plant management has directed that responses for ISEG reports be generated by responsible managers which address pertinent issues identified in the report."

In deviation from the above, the NRC inspector found on December 15, 1987, that no response had been generated to an ISEG report entitled, "ISEG Observation of the Work Control Center," and dated September 10, 1987. This report was issued prior to the issuance of the committed procedure on September 28, 1987.

II. Reason for Deviation

As noted in Reference 2, ISEG originally determined that a response was not required. A reevaluation determined that the findings of the observation were serious enough to warrant a response.

III. Corrective Actions Taken

The Outage management group provided a response to the ISEG observations on January 20, 1988.

IV. Corrective Actions That Will Be Taken

No additional corrective actions are considered necessary.

V. Date When Full Compliance Will Be Achieved

STPEGS is in full compliance at this time.



Attachment A  
Response to Notice of Deviation  
From Inspection Report 87-77  
(Page 5 of 6)

Deviation B

I. Statement of Deviation

In a letter (ST-HL-AE-2328), dated August 18, 1987, to the NRC, the licensee clarified their response as reported in their July 15, 1987, letter for Observation No. 20. Their revised response stated that for the processing and investigating of anonymous tips related to drug use, the NSD will "contact local law enforcement officials concerning the subject of the anonymous tip."

In deviation from the above, an NSD representative stated that local law enforcement officials were contacted only when the allegation had been confirmed or a substantial amount of information was provided by the anonymous alleger.

II. Reason for Deviation

This deviation was caused by a breakdown in communications between the parties involved in establishing the subject commitment. The organization that submitted this commitment to the NRC understood that the local law enforcement would be contacted for all anonymous tips. In fact, the investigating organization treated anonymous tips as indicated above.

III. Corrective Actions Taken

HL&P has reevaluated the original commitment made to the NRC and has concluded that it is not appropriate that the local law enforcement be contacted for all anonymous tips. Accordingly, the "STP Drug and Alcohol Screening Behavioral Observation Action Guidelines for Fitness for Duty Program" has been revised to read as follows:

"If the investigator determines that enough specific information has been provided to lend credibility to the referral, the Sheriff's Department or other LLEA as appropriate shall be contacted to request information which maybe of assistance in the investigation."

In addition, plant management has had discussions with plant personnel to reinforce the concept that commitments must be accurately communicated to the NRC.

To address the generic implication of the item, please see Attachment B.

Attachment B  
Response to NRC Concern Relative to  
the Adequacy of the HL&P Licensing  
Commitment Tracking System

Subsequent to the submittal of HL&P response to the initial Operational Readiness Inspection findings (provided at the exit) the commitments made therein were entered on the Licensing Commitment Tracking System (LCTS). The "status" of the completion of each commitment was monitored by upper management on a weekly basis to ensure timely closure. A compliance type review was not performed during this time frame to ensure that the scope and intent of the commitments had actually been satisfied as is done for 10CFR50.55e reports and Inspection and Enforcement Bulletins. This review could have revealed that commitments were in fact not complete or that additional clarifications should be provided to the NRC.

Corrective Action

To preclude this situation occurring in the future, the following actions have been taken.

- . The Licensing Group is performing compliance reviews for the closure of commitments made to the NRC via correspondence.
- . Plant Management has revised the policy on Licensing Commitments stressing the need for accurately portraying commitments in correspondence to the NRC and specifying rules whereby commitments can be changed.

Attachment A  
Response to Notice of Deviation  
From Inspection Report 87-77  
(Page 6 of 6)

Deviation B (Cont.)

IV. Corrective Actions To Be Taken

No additional actions on this issue are required.

V. Date When Full Compliance Will Be Achieved

STPEGS is in full compliance at this time.