

June 13, 1997

Mr. William T. Cottle  
Executive Vice-President &  
General Manager, Nuclear  
Houston Lighting & Power Company  
South Texas Project Electric  
Generating Station  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REVIEW OF REVISED OPERATIONS QUALITY ASSURANCE PLAN (OQAP), SOUTH TEXAS PROJECT, UNITS 1 AND 2 (STP) (TAC NOS. M92450 AND M92451)

Dear Mr. Cottle.

The Nuclear Regulatory Commission (NRC) staff is reviewing Houston Lighting & Power Company's (HL&P's) Revised Graded Quality Assurance OQAP, dated May 21, 1997. Based on its review, the staff has identified areas needing revision or additional information (enclosed).

Should you have any questions, please contact Suzanne Black at (301) 415-1017.

Sincerely,

ORIGINAL SIGNED BY:

Thomas W. Alexion, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Comments on May 21, 1997 Revised OQAP

cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "Thomas W. Alexion".

Thomas W. Alexion, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

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Mr. William T. Cottle  
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South Texas, Units 1 & 2

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OPERATIONS QUALITY ASSURANCE PLAN (OQAP)

COMMENTS ON MAY 21, 1997 DRAFT SUBMITTAL

Based on the Nuclear Regulatory Commission's (NRC's) review of the Houston Lighting & Power Company's (HL&P) draft submittal of the Graded Quality Assurance OQAP, dated May 21, 1997, the following comments have been developed:

1. "Definitions", p. 4 of 10 - The definition of "critical characteristics" needs to be revised to be consistent with the definition given in 10 CFR 21.3.
2. Chapter 1.0, §5.1.4.2, p. 3 of 4 - What are the full responsibilities of the Manager, Risk Management & Industrial Relations?
3. Chapter 2.0, §3.1, p. 1 of 15 - "Station economics" should not be a factor in considering the safety needs for a nuclear power plant.
4. Chapter 2.0, §2.2, p. 1 of 15 - Please provide explanatory words for including "(except design and fabrication of NRC certified radioactive waste shipping casks)."
5. Chapter 2.0, §5.3.3, p. 4 of 15 - Add "Initial evaluations are performed by the Working Group." to the end of the paragraph.
6. Chapter 2.0, §5.3.5, p. 4 of 15 - After "are" in the first sentence, add "developed by the Working Group and are."
7. Chapter 2.0, §5.3.10, p. 5 of 15 - After "experience", add "that could result in recategorization of any SSC." In the next sentence after "are", add "also used." (These suggested changes provide an acceptable response to Question #9 of NRC's 04/14/97 letter).
8. Chapter 2.0, NOTE, p. 5 of 15 - It appears that this note is redundant to §5.3.9 above.
9. Chapter 2.0, Table I, p. 14 of 15 - For the BASIC program exception to §12 of ANSI N45.2.13-1976, add "for audit of suppliers" after "necessary."
10. Chapter 13.0, p.4 of 4 - Add a new §5.8 as follows to provide an acceptable response to Question #4 of NRC's 04/14/97 letter:

\*5.8 For medium and low safety significant SSCs treated by the BASIC program controls, measures shall be established to conduct apparent cause determinations and to trend failures to assist in evaluating the need for more detailed root cause analyses (if excessive failures occur) and proper corrective action. Further, particular consideration will be given to assessing the potential implications of such failures generically to similar SSCs treated by the FULL program."

ENCLOSURE

11. During the May 5-8, 1997, site visit NRC expressed concern that placing components with a risk achievement worth (RAW) greater than 10 but less than 100 in the Basic program may be inappropriate. NRC requested that HL&P identify this population of components in the QA program description, and describe how specific QA controls would be assigned to the components' critical attributes. NRC has not found a satisfactory resolution to this concern in the May 21, 1997, revised submittal. NRC requests that STP change the QA program description to:
- include a clear definition of the population of components in question. These components are currently categorized as medium-safety-significant which provides no distinction from other medium-safety-significant populations. NRC is willing to consider the acceptability of a definition of this population which does not include numerical guidelines in the OQAP, but the basic attributes of the population (e.g., high reliability yet a high impact on risk if problems develop) must be clearly described.
  - provide a description of how QA controls will be assigned to the critical attributes of this population of components. As discussed, NRC does not find that simple application of Basic program controls is sufficient. Nor does NRC find that explicit consideration by the working group and expert panel of the assigned controls is sufficient. NRC is willing to consider the acceptability of assigning Full program controls to those critical component attributes which cause the component to belong to this population.

Another alternative is to simply assign these components to the high-safety-significant category based on the sensitivity of plant risk on their performance and place them in the FULL program. Other alternatives may also be suggested.

12. Although not discussed during the May 5-8, 1997, site visit, discussion among the NRC on the acceptability of your proposed categorization scheme has raise the question of why a high Fussell-Vesely (FV) value should not also lead to a high-safety-significant categorization regardless of the RAW. Please provide your position with respect to this issue.
13. Practices and activities to ensure quality of the South Texas PRA are an important element in justifying use of risk insights as part of the GQA program. It is the staff's understanding that current CDF and LERF values are approximately an order of magnitude lower than in the 1989 (CDF) and 1992 (LERF) baseline studies. Please provide details of processes to ensure that the PRA updates and modifications were correctly implemented. This should include:
- a listing of the modifications made to the PRA, the reason for each change and a discussion of the impact on the plant's risk profile.

- quality activities to ensure that PRA revisions were correctly identified, modeled, verified, tracked and implemented.
- 14. During the May 5-8, 1997, site visit, you discussed an audit of your PRA contractors QA program. Please provide the results of the audit or assessment of the QA program of your PRA contractor.
- 15. In your response to RAI G-1 under cover letter dated October 30, 1996, you wrote that, "recently program procedures were developed to implement Appendix B features to establish configuration control of the PSA models." We note that we have received four procedures by letter dated May 22, 1997. The May 22, 1997, cover letter also stated that the "Configuration Control of the Probabilistic Safety Assessment Procedure" has been deleted. Please provide us with the procedures which will implement Appendix B features to establish configuration control of the PRA models, or identify which of the four procedures is intended to provide that control.