

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station PO Box 289 Wadsworth, Texas 77483

July 2, 1997

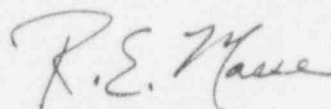
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File No.: G02.04.02
10CFR2.201
STI-30326873

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Reply to Notice of Violation 97003-01

South Texas Project has reviewed Notice of Violation 97003-01, dated June 5, 1997, and submits the attached reply. The events described in the Notice of Violation did not have an adverse effect on the health and safety of the public.

If there are any questions regarding these replies, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7988.



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Plant Manager,
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IED 1/1

WEM/wem

Attachment: Reply to Notice of Violation 97003-01

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I. Statement of Violation:

10 CFR 55.53(h) requires that each licensed operator complete a requalification program as described by 10 CFR 55.59.

10 CFR 55.59(a) requires, in part, that each licensed operator complete a requalification program developed by the licensee that has been approved by the Commission and that the program be conducted for a continuous period not to exceed 24 months in duration.

Contrary to the above, at the licensee's direction, from January 1996 to April 1997, one senior operator licensed at the licensee's facility did not complete the licensee's continuous requalification training program.

This is a Severity Level IV violation (Supplement 1) (498;499/97003-01).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The reason for this event was incorrect interpretation of regulations.

During November of 1995, a Licensed Operator was reassigned to a rotational position that did not require an NRC Operator License. Due to time constraints of the new position an evaluation was made to determine if the regulations would allow the Licensed Operator to temporarily withdraw from the Licensed Operator Requalification Program. The evaluation concluded that provisions in NUREG 1262 allowed for non-attendance of Licensed Operator Requalification training for up to two years under special circumstances. Based on this interpretation the Licensed Operator stopped attending Licensed Operator Requalification training with management's concurrence.

On January 25, 1996 the Operations Training Division issued a memo to the Licensed Operator documenting that he had not completed the requirements of the Licensed Operator Requalification training and should not perform any NRC licensed duties until such time that remedial training was completed in accordance with the Licensed Operator Requalification Procedure. Specifically this would require the Licensed Operator to make up all the training that was missed in Licensed Operator Requalification training and require an annual examination prior to returning to Licensed duties.

In February 1997, the Licensed Operator was returned to a position requiring an Operator License. A program was developed to ensure the requirements were met for the Licensed Operator's reinstatement to the position and to document completion of the required Licensed Operator Requalification training.

On February 20, 1997, the recently received copy of Interim Rev. 8 of NUREG 1021 was reviewed. This revision is very clear in the area of attendance in Licensed Operator Requalification. After reviewing the new revision, it was concluded that the regulations may have been misinterpreted in this matter. The NRC regional office was contacted and agreed that the regulations were not properly followed.

IV. Corrective Actions:

- A program to complete the necessary remediation in the Licensed Operator Requalification program for the Licensed Operator was developed. This program was completed on June 13, 1997.
- A Training Bulletin will be issued to all Licensed Operators restating the requirement to attend Licensed Operator Requalification training as a condition of the License.
- A review of this event was included in Lessons Learned Training for all Licensed Operator Requalification. This review covered the differences in Revision 7 of NUREG 1021 and Interim Revision 8 to NUREG 1021 as well as the requirement to attend Licensed Operator Requalification.

V. Date of Full Compliance:

The South Texas Project is in full compliance.

VI. Additional Information

The Operations Training Division of the Nuclear Training Department tracks attendance in the Licensed Operator Requalification Training program and must sign for license activation per the Licensed Operator License Maintenance Procedure. Consequently, the possibility of this individual activating his license and assuming a watch requiring a NRC license did not exist. The Licensed Operator was aware of his license status at all times.

The Operations Training Division reviewed the training status of other licensed operators having an inactive license to ensure that the Licensed Operator Requalification Training Program requirements were met. The review showed all other personnel are meeting the program requirements.