

JAN 29 1988

In Reply Refer To:
Dockets: 50-498/87-39
50-499/87-39

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 January 5, 1988, in response to our
Inspection Report Open Item 498/8739-04 dated August 18, 1987. We have
reviewed your reply and find it responsive to the concerns raised in our open
item. We will review the information you provided during a future inspection
to determine that this item can be closed.

Sincerely,

Original Signed By
L. J. Callan

L. J. Callan, Director
Division of Reactor Projects

cc:
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RIV:DRP/D *JSB*
HBundy:gb
1/25/88

[Signature]
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Houston Lighting and Power
Company

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cc: (continued)
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Texas Radiation Control Program Director

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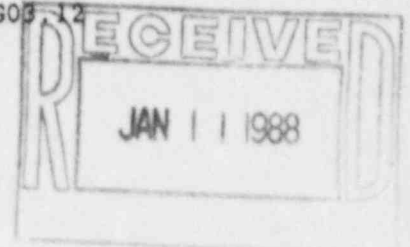
The Light company

Houston Lighting & Power

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January 5, 1988
ST-HL-AE-2470

File No.: G03.08/G03-12
10CFR50

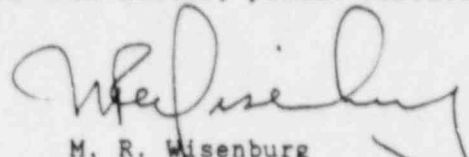


U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Inspection Report Item (498/8739-04):
GL 83-28, Item 2.2, "Equipment Classification and Vendor Interface
(Programs for All Safety-Related Components)"

In response to the NRC letter dated May 4, 1987, Houston Lighting & Power Company (HL&P) has prepared the attached discussions of the Nuclear Utility Task Action Committee/Vendor Equipment Technical Information Program (NUTAC/VETIP) program as it is implemented at the South Texas Project Electric Generating Station and the quality assurance controls over vendor-supplied service on safety-related equipment. The information is provided to close out Inspection Report Open Item (498/8739-04).

If you should have any questions on this matter, please contact Mr. M. A. McBurnett at (512)972-8530.


M. R. Wisenburg
Manager, Engineering and Licensing

MRW/PLW/lzs

Attachment: Response to Request for Additional Information: Generic Letter 83-28, Item 2.2 (Part 2) - NRC Letter Dated May 4, 1987 (ST-AE-HL-91255).


NL.RES.INS.RP

A Subsidiary of Houston Industries Incorporated

IC-88-009

cc:

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South Texas Project Electric Generating Station
Units 1 and 2

Response to Request for Additional Information:
Generic Letter 83-28, Item 2.2, (Part 2),
"Equipment Classification and Vendor Interface
(Programs for all Safety-Related Components)"

A. NRC Concern:

The applicant states that they participate in the NUTAC/VETIP program. This is not sufficient. The licensee should describe how their procedures were revised to implement and incorporate the NUTAC/VETIP program to compensate for the lack of a vendor interface for safety-related equipment.

Response:

The following procedures were written to provide the South Texas Project Electric Generating Station (STPEGS) a method of communications with NRC, INPO, other utilities and vendors regarding equipment technical information:

1. OPGP03-ZA-0038, "Nuclear Plant Reliability Data System (NPRDS) Program"

This procedure provides an overview of the scope of the NPRDS Program, data base development, and reporting requirements. The Nuclear Plant Operations Department is responsible for implementation of the NPRDS Program.

2. OPGP03-ZE-0026, "NPRDS Failure Reporting"

This procedure provides a method of reporting system and component failures according to the guidelines of the NPRDS. When a system or component failure is discovered, an investigation is performed and a report is submitted in accordance with this procedure and with the NPRDS reporting requirements contained in OPGP03-ZA-0038.

A. Response (Cont.)

3. IP-2.2Q, "Operations Experience Review"

This procedure provides STPEGS a uniform method for the screening and review of INPO documents (Significant Event Reports, Significant Operating Experience Reports, Operations and Maintenance Reminders, and events determined to be significant by others) and NRC documents (IE Bulletions, IE Information Notices, and Generic Letters). Upon receipt of the document, the responsible engineer reviews the event for applicability to STPEGS and develops a plan of action, if appropriate.

4. IP-1.28, "Nuclear Network"

This procedure provides a consistent method for distribution, and control of retrievals and entries to the NUCLEAR NETWORK information system. NUCLEAR NETWORK is a computerized international electronic communications system designed for the exchange of information on nuclear power plant design, construction, licensing, safety and operations. Designated STPEGS discipline representatives have been selected to serve as the focal points for distribution of NUCLEAR NETWORK information between STPEGS, INPO, and INPO member utilities.

5. IP-1.8Q, "Control of Vendor Documents"

This procedure provides a program for the receipt, review, statusing and distribution of vendor-supplied design and technical documents applicable to STPEGS. STPEGS Project Document Control ensures that the vendor documents for safety-related components which are required to be statused are controlled for the life of STPEGS in accordance with this procedure. The VETIP coordinator screens, tracks the status, and assigns reviewers for vendor bulletins and advisories.

6. IP-1.45Q, "Station Problem Reporting"

This procedure provides a uniform requirement for STPEGS management and administrative controls for identifying, documenting, evaluating, and reviewing reports of abnormal conditions or events. Administrative controls are established to ensure that all abnormal conditions and events are promptly identified and corrected in accordance with this procedure. This procedure also provides the direction for NRC notification of reportable abnormal events.

A. Response (Cont.)

7. IP-1.03Q, "Reporting Design and Construction Deficiencies to the NRC"

This procedure provides a program for identifying and evaluating conditions which could possibly affect the safe operation of STPEGS and for reporting deficiencies, defects, and noncompliances to the NRC in accordance with 10CFR50.55(e) and 10CFR21.

B. NRC Concern:

The staff finds the NUTAC/VETIP program acceptable for those instances where a vendor interface cannot be practicably established, e.g., where a vendor has gone out of business. However, the applicant should commit to establish a program to periodically contact vendors of key components (such as auxiliary feed pumps, safety-related batteries, ECCS pumps, and safety-related valve operators) to facilitate the exchange of current technical information. In the case of the diesel generator and safety-related switch-gear vendors, a formal interface such as that with the NSSS vendor should be established if practicable.

Response:

The following program will be established and incorporated in the next revision of IP-1.8Q, "Control of Vendor Documents," but not later than June 30, 1988, to include a periodic contact (interface) with vendors of components which are safety-related. The vendor manuals for the key components referenced in the NRC concern have been identified and classified as safety-related manuals.

1. The vendors who supplied safety-related manuals will be notified by mail at least every 18 months to confirm that the in-house safety-related manuals are the most current.
2. These vendors will be requested to provide confirmation in writing.
3. All the interfacing vendor letters will be tracked under the VETIP program.

At present, the diesel generator and safety-related switchgear vendors are to be included in the list of vendors who supplied the safety-related manuals.

C. NRC Concern:

The applicant has not stated that they have procedures to provide the proper quality assurance control over vendor-supplied service on safety-related equipment. The applicant should verify that the responsibilities of the licensee or applicant and vendors that provide service on safety-related equipment are defined such that control of applicable instructions for maintenance work on safety-related equipment is provided.

Response:

The HL&P quality assurance program requires that vendors performing services, including maintenance, on safety-related equipment be listed on the Approved Vendors List (AVL). Prior to being placed on the AVL, HL&P Nuclear Assurance (NA) verifies that the vendor has a quality program which is commensurate with the activity to be performed.

Prior to performing services, a Request on Purchasing Department (RPD) and, if required, a specification will be issued. The cognizant technical organization, with NA concurrence, establishes the quality requirements to be contained in the RPD and, if required, the specification; this would include, where appropriate, instruction and procedure control.

When vendors are performing maintenance services under the Maintenance Work Request (MWR) program, they are under the direct responsibility of the Houston Lighting & Power (HL&P) Maintenance Department. The MWR program requires that maintenance activities on quality-related equipment or systems be performed in accordance with approved written procedures, documented instructions or drawings appropriate to circumstances which conform to applicable codes, standards, specifications, and criteria.

When vendors perform maintenance services not under the control of the MWR program, the Contractor Work Request (CWR) program requires a work package to be developed which is approved by HL&P.

In either situation, HL&P NA is responsible for performing audits and surveillances to ensure that procedural controls are being properly implemented.