

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

July 16, 1997
ST-HL-AE-5696
File No.: G02.05
10CFR50.54(a)

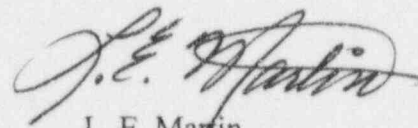
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Change QA-033 to the Operations Quality Assurance Plan Revision 13

The South Texas Project submits the attached change (QA-033) to the Operations Quality Assurance Plan provided to the Nuclear Regulatory Commission on May 22, 1997 (ST-HL-AE-5661). This change incorporates the definition of "Targeted" as discussed in our response to the "Request for Additional Information" letter submitted on June 26, 1997 (ST-HL-AE-5679).

Change QA-033 to the Operations Quality Assurance Plan will be implemented as part of the methodology for the South Texas Project's Graded Quality Assurance Program.

If there are any questions regarding this matter, please contact Mr. R. J. Rehkugler at (512) 972-7922 or me at (512) 972-8686.



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Licensing

JMP/

Attachment: Operations Quality Assurance Plan Change QA-033

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Project Manager on Behalf of the Participants in the South Texas Project

Houston Lighting & Power Company
South Texas Project Electric Generating Station

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OQAP CHANGE QA-033
SUMMARY OF CHANGES
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ALL CHANGES ARE IN BOLD TYPE

<u>CHAPTER</u>	<u>LOCATION</u>	<u>ACTION</u>	<u>TEXT</u>
TOC	CH. 2.0	INSERT	QA-033
TOC	CH. 13.0	INSERT	QA-033
CH. 2.0	5.3.8	INSERT	in the first sentence after the words "safety related SSCs" for which 10 CFR50 Appendix B is not applicable , and in the second sentence after the words "Specific program controls" consistent with applicable portions of the "full" and "basic" program controls
CH. 13.0	5.8	DELETE	conduct apparent cause determination
CH. 13.0	5.8	INSERT	identify causes

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Chapter Number	Title	Effective Chapter Revision	Effective Revision Date	Change Notice No.
	Definitions	7		QA-032
1.0	Organization	9		QA-032
2.0	Program Description	11		QA-032 QA-033
3.0	Conduct of Plant Operations	7		
4.0	Qualification, Training, and Certification of Personnel	6		
5.0	Maintenance, Installation of Modifications, and Related Activities	5		
6.0	Design and Modification Control	7		
7.0	Procurement	7		
8.0	Control and Issuance of Documents	6		
9.0	Control of Material	6		
10.0	Inspection	7		
11.0	Test Control	6		
12.0	Instrument and Calibration Control	6		
13.0	Control Of Conditions Adverse to Quality	8		QA-032 QA-033
14.0	Records Control	5		
15.0	Quality Oversight Activities	7		
16.0	Reserved for Future Use			

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Chapter Number	Title	Effective Chapter Revision	Effective Revision Date	Change Notice No.
17.0	ASME Code Section XI - Repairs and Replacements	5	12-30-94	
18.0	ASME Code Section XI - Inservice Inspection and Testing	6	01-01-97	

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attributes of SSCs needed to support systems' critical functions. These controls are intended to reflect economical and efficient business practices. Table I to the OQAP chapter prescribes the program commitments applicable to "Basic" program activities.

- 5.3.8 "Targeted" program controls are applied to non-safety related SSCs, for which 10CFR50, Appendix B is not applicable, categorized as "high" or "medium" safety significant/risk importance. Specific program controls consistent with applicable portions of the "full" and "basic" program controls are applied to those items in a selected manner, "targeted" at those characteristics or critical attributes that render the SSC significant or important.
- 5.3.9 Components that are highly reliable, yet whose failure would result in a significant increase in risk, will receive Full program coverage, or will be evaluated based on their risk importance to ensure that Full program controls are applied to their critical attributes.
- 5.3.10 SSCs governed by the OQAP shall retain "Full" program coverage until such time as prescribed risk-informed, performance-based analyses are completed and approved, and they are placed into other program categories (i.e., "Targeted" or "Basic") as appropriate.
- 5.3.11 A vital element of the GQA program is the "feedback" loop. On a periodic basis, and as prescribed in the Comprehensive Risk Management procedure, the GQA Working Group and Expert Panel shall review any changes to the PSA information and performance/operating experience that could result in recategorization of an SSC. These reviews are also used to assess the effectiveness and appropriateness of in-place quality program controls. Adjustments shall be made as determined necessary. Those components for which an increase in failure rates results in a significant increase in risk will have Full program controls established.

QA-033

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SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN CONTROL OF CONDITIONS ADVERSE TO QUALITY	NUMBER Chapter 13.0	REV. NO. 8
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- 5.3.3 Actions to be taken to assure timely corrective action on conditions adverse to quality.
- 5.4 Procedures which identify and track conditions adverse to quality shall require management review of each report to determine if the condition is significant. For significant conditions adverse to quality, the cause of the condition and the corrective action taken to preclude repetition shall be documented and reported to appropriate levels of management.
- 5.5 Measures shall be established for review and evaluation of conditions adverse to quality for reportability to the NRC as required by References 4.2, 4.3, and 4.4, as appropriate.
- 5.6 The authority to stop work has been assigned to the General Manager, Nuclear Assurance and Licensing for any activity being performed by company personnel or contractors which do not conform to established requirements.
- 5.7 Measures shall be established for the evaluation and trending of conditions adverse to quality. The results of these reviews and analyses are reported to the affected organization and executive management, and are audited by the Quality organization. Adverse trends shall be evaluated and processed in accordance with controlling procedures.
- 5.8 For medium and low safety significant SSCs treated by the Basic program controls, measures shall be established to identify causes and to trend failures to assist in evaluating the need for more detailed root cause analysis (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.

QA-032, QA-033