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.

L. E. Martin
General Manager,
Nuclear Assurance &
Licensing

JMP/

Attachment: Operations Quality Assurance Plan Change QA-033

A004
1/1

220093

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

Ellis W. Merschoff
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Thomas W. Alexion
Project Manager, Mail Code 13H3
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

David P. Loveless
Sr. Resident Inspector
c/o U. S. Nuclear Regulatory Comm.
P. O. Box 910
Bay City, TX 77404-0910

J. R. Newman, Esquire
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

M. T. Hardt/W. C. Gunst
City Public Service
P. O. Box 1771
San Antonio, TX 78296

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Central Power and Light Company
ATTN: G. E. Vaughn/C. A. Johnson
P. O. Box 289, Mail Code: N5012
Wadsworth, TX 77483

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61067
Houston, TX 77208

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Dr. Bertram Wolfe
15453 Via Vaquero
Monte Sereno, CA 95030

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

J. R. Egan, Esquire
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, D.C. 20037

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

OQAP CHANGE QA-033
SUMMARY OF CHANGES

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
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**

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS	NUMBER Table of Contents	REV. NO. 13
	PAGE 1 OF 2	
	EFFECTIVE DATE	

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. QA-033

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. QA-032

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-032 QA-032

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 tc 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