APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION REGION 1V

NRC Inspection Report: 50-498/88-23

Operating License: NPF-76

50-499/88-23

Construction Permit: CPPR-129

Dockets:

50-498 50-499

Licensee:

Houston Lighting & Power Company (HLZP) P.O. Box 1700

Houston, Texas 77001

Facility Name: South Texas Project Electric Generating Station (STP), Units 1

and 2

Inspection At: STP Site, Bay City, Matagorda County, Texas

Inspection Conducted: April 13-15, 1988

Inspector:

H. D. Chaney, Radiation Specialist, Facilities

Radiological Protection Section

Approved:

E. Baer, Acting Chief, Radiological Protection Section

Inspection Summary

Inspection Conducted April 13-15, 1987 (Report 50-498/88-23; 50-499/88-23)

Areas Inspected: Routine, unannounced inspection of the licensee's radiation protection program, including the conduct of the reactor startup radiation shield surveys. An allegation concerning inadequate training of decontamination technicians and poor radiological work practices was reviewed.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

HL&P

*W. Kinsey, Plant Manager

C. Ayala, Project Compliance Engineer

*R. Craft, Radiological Protection Supervisor

*J. Geiger, Manager, Nuclear Assurance *G. Jarvela, Health Physics Division Manager *J. Lovell, Manager, Technical Services

*M. McBurnett, Manager, Support Licensing

*W. Parish, Radiological Support Supervisor

*P. Walker, Senior Licensing Engineer *M. Wisenburg, Plant Superintendent, Unit 1

Others

D. Carpenter, NRC Senior Resident Inspector

L. Constable, NRC Section Chief, Reactor Project Section D

*Denotes those present during the exit interview.

The NRC inspector also contacted other licensee personnel including security and contractor employees.

2. NRC Inspector Observation

An NRC inspector observation is a matter discussed with the licensee during the exit interview. Observations are neither violations, deviations, nor unresolved items. They have no specific regulatory requirement, but are suggestions for the licensee's consideration.

Contract Health Physics (HP) Technician Selection - The licensee's process for selection and evaluation of contract HP technicians is only partially documented in procedures.

3. Radiation Protection

The licensee's conduct of the reactor radiation shielding surveys during power ascension testing was reviewed for compliance with the commitments in Section 14 of the Final Safety Analysis Report (FSAR).

Performance of Startup Surveys (83521-02.01) - The NRC inspector reviewed shield survey procedures (OPGP03-ZR-0037 and OPGP03-ZR-0038) and surveys results for facility radiation shielding surveys conducted at approximately 2 percent reactor power on March 22-23,

1988. An observation report on the conduct of the shield survey, prepared by the Independent Safety Evaluation Group, was reviewed.

b. Correction of Identified Problems (83521-02.02) The licensee's shield survey implementing procedures provide for the luation and resolution to radiation levels found to be cut as the values stated in Section 12 of the FSAR.

No violations or deviations were identified.

 Control of Radioactive Materials and Contamination, Surveys, and Monitoring (83726-02.03 and 02.04)

The licensee's programs for the control and survey/monitoring of radioactive material (RAM) were reviewed for compliance with the requirements of Technical Specification (TS) 6.11 and 6.12 and 10 CFR Parts 19.12, 20.4, 20.5, 20.201, 20.203, 20.205, 20.207, and 20.301.

The NRC inspector reviewed the licensee's radiological survey program involving prework Radiation Work Permit evaluations, ongoing work activities, storage areas, change rooms, lunch and meeting rooms, radiological control points, and material being released from radiologically controlled areas. The NRC inspector performed confirmatory measurements in selected plant areas. All results agreed with documented surveys performed by the licensee. The licensee's radiological controls for work operations appear to effectively control personnel exposure.

No violations or deviations were identified.

5. Allegation Followup

Allegation No. RIV-87-A-0080

An anonymous allegation was received in the NRC Regional office on October 28, 1987, expressing several concerns about EBASCO (construction subcontractor) laborers used for radioactive material decontamination activities.

a. Allegation: Failing to get ac least a 70-percent grade on training test.

Finding: The NRC inspector substantiated that at least five EBASCO Taborers failed to attain a passing grade of 70 percent on training tests administered by the STP HP department. It was also confirmed that none of the personnel so identified have been used as decontamination technicians at STP.

b. Allegation: EBASCO is not properly training its people in decontamination techniques.

Finding: This item could not be substantiated. The licensee had established an adequate and well documented training program for qualification of EBASCO and other contractor personnel. This training has been supplemented with actual hands-on decontamination of contaminated areas under instructor and plant HP supervision.

c. Allegation: EBASCO laborers were chewing gum in the radiologically controlled area (RCA).

Finding: This item could not be substantiated. The time period of the allegation coincided with the licensee's initial lock down of the facility and implementation of the radiological controlled area controls. The NRC inspector did receive information that certain personnel may be bringing their lunches into the RCA; this could not be substantiated during this inspection. HP personnel were appraised of the possibility of personnel taking their lunches into the RCA.

d. Allegation: Portal monitors (exiting the RCA) are ignored by EBASCO laborers when HF personnel are not there to observe personnel use of them.

Finding: This allegation could not be substantiated. During the initial implementation period of the RCA (prior to reactor operation) many personnel had to be reminded that the portal monitors were operational and that they were expected to use them. Currently, there is a remote surveillance camera and portal alarm system routed into the HP office (adjacent to the RCA exit) to ensure that personnel properly use the portal monitors. No personnel were observed to be bypassing the portal monitors as they exited the RCA during this inspection.

This allegation be considered <u>closed</u>.

No violations or deviations were identified.

6. Licensee Event Report (LER) (92700)

(Closed) LER (498/87-009): Missed TS surveillance test - The licensee determined on September 18, 1987, that the TS 4.3.3.1 test of the Containment Building atmosphere monitor (RT-8011) iodine channel was not performed. Subsequent testing of the subject channel found it operable. The NRC inspector reviewed the results of the licensee's short term and long term corrective actions referenced in the LER and determined that the licensee had implemented adequate corrective actions to prevent a further recurrence of this incident.

The failure to properly conduct TS required surveillances would normally considered an apparent violation of TS 4.3.3.1. However, this occurrence will be classified as a licensee identified violation in accordance with the guidance contained in Section V.A of Appendix C to 10 CFR Part 2.

7. Exit Interview

The NRC inspector met with licensee representatives identified in paragraph 1 at the conclusion of the inspection on April 15, 1988. The NRC inspector summarized the inspection and findings.