



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

October 5, 1998

EA 98-322

William T. Cottle, President and
Chief Executive Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, Texas 77483

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 50-498; -499/98-01 AND DENIAL
OF NOTICE OF VIOLATION

Dear Mr. Cottle:

This is in reference to your letter dated July 21, 1998, in which you denied two violations of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Your letter was in response to a Notice of Violation issued June 16, 1998, in conjunction with NRC Inspection Report 50-498; -499/98-01.

In regard to Violation 50-498; -499/9801-01 that cited the failure to include the digital rod position indication system into the scope of the Maintenance Rule Program, you stated that you still believe that the digital rod position indication system is not required to mitigate accidents and should not be included as an example in this violation. However, you stated that station management decided to add this system to the Maintenance Rule program based on the NRC position. It remains NRC's position that the digital rod position indication system is required to be included in the scope of the Maintenance Rule because it provides an assessment function and is an integral portion of the mitigation function. A primary operator action taken during use of emergency operating procedures is to use this system to determine whether control rods are fully inserted and adequate shutdown margin has been achieved. We will review your corrective actions related to Violation 50-498; -499/9801-01 during a future inspection.

Your response also denied Violation 50-498; -499/9801-03. This violation involved the failure to establish adequate measures to evaluate the appropriateness of the performance of preventive maintenance for the solid state protection system. Specifically, you had no performance measures established for availability of the solid state protection system. In denying Violation 50-498; -499/9801-03, your letter referenced the guidance of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2, Section 12.2.4, "Optimizing Availability and Reliability for SSCs." You also stated in Letter NOC-AE-000230, dated July 21, 1998, that an unavailability sensitivity study using the South Texas Project Probabilistic Risk Assessment demonstrated that solid state protection system logic train unavailability has negligible impact on plant risk (i.e., core damage frequency).

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Section 12.2.4 of NUMARC 93-01 provides several ways to meet the requirements of 10 CFR 50.65(a)(3). Your denial was based on each of the following examples for meeting the balancing requirement provided in Section 12.2.4, which included:

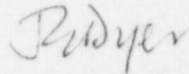
- Ensuring that appropriate preventive maintenance is performed to meet availability objectives as stated in plant risk analysis, Final Safety Analysis Report, or other reliability approaches to maintenance;
- Allocating preventive maintenance to applicable tasks commensurate with anticipated performance improvement;
- Reviewing to determine that availability of structures, systems, or components has been acceptable;
- Focusing maintenance resources on preventing those failure modes that affect a safety function; or
- Scheduling, as necessary the amount, type, or frequency of preventive maintenance to appropriately limit the time out of service.

On September 16, 1998, a telephonic conference call was held to further discuss your position on the solid state protection system (i.e., not monitoring unavailability). During that conference call, your staff stated that STP was meeting the intent of NUMARC 93-01, Section 12.2.4. "Optimizing Availability and Reliability for SSCs." Specifically all five recommended approaches to balancing availability and reliability were addressed as part of your program. Your staff also stated that an unavailability sensitivity study using South Texas Project's Probabilistic Risk Assessment, which demonstrated that the solid state protection system logic train unavailability has negligible impact on plant risk (i.e., core damage frequency) had been performed. This information was not specifically reviewed and assessed during our inspection. Accordingly, NRC Violation 50-498; -499/9801-03 will be reclassified as Unresolved Item 50-498; -499/9801-03 until the NRC staff further reviews the following items: (1) How you meet the intent of NUMARC 93-01, Section 12.2.4, "Optimizing Availability and Reliability for SSCs," for this system and potentially other systems; and (2) the sensitivity study discussed above, specifically with respect to the assumed surveillance testing hours for unavailability for the solid state protection system. These issues will be reviewed during a subsequent followup inspection.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR).

If you have any questions regarding this matter, please contact Dr. Dale Powers at 817/860-8195.

Sincerely,



James E. Dyer
Deputy Regional Administrator

Docket Nos.: 50-498; 50-499
License Nos.: NPF-76; NPF-80

Enclosure:
Supplemental Information

cc:
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bcc to DCD (IE01)

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09/23/98	09/24/98	10/1/98	09/28/98	10/1/98	10/5/98

*previously concurred

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ENCLOSURE

SUPPLEMENTAL INFORMATION

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D. Powers, Chief, Maintenance Branch

ITEMS OPENED AND CLOSED

Opened

50-498; -499/9801-03	URI	Failure to adequately monitor the solid state protection system and other risk significant electrical and instrumentation and control SSCs.
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Closed

50-498; -499/9801-03	VIO	Failure to adequately monitor the solid state protection system.
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