May 8, 1986 ST-HL-AE-1659 File No.: G3.8

Mr. Vincent S. Noonan, Project Director PWR Project Directorate #5 U. S. Nuclear Regulatory Commission Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Policy Statement on Engineering
Expertise on Shift (Generic Letter 86-04)

Dear Mr. Noonan:

By Generic Letter 86-04 the NRC requested certain information regarding licensees' programs for meeting the Commission's requirements for providing engineering expertise on shift (NUREG-0737, Item I.A.1.1) and for licensed operator staffing (10CFR50.54(m)(2)). In response to this request Houston Lighting & Power Company submits the following information for the South Texas Project (numbered to correspond to the request in the Generic Letter):

- 1. HL&P's current program for providing engineering expertise on shift is to use separate Shift Technical Advisors (STAs) who have been certified in accordance with an NRC approved program. The STA position will be filled with engineers assigned to the Nuclear Plant Operations Department. There are currently eleven (11) engineers enrolled in the STA Training Program. Although not required for STA certification, these 11 engineers are also SRO Cold License Candidates.
- 2. A candidate for STA Certification must have a bachelor's degree or the equivalent in a scientific or engineering discipline. A waiver for the required education may be granted by the Vice President, Nuclear Operations when a candidate has documented accredited college courses or can demonstrate an acceptable level of knowledge. An acceptable level of knowledge can be demonstrated by one or more of the following methods:
  - a. A Bachelor of Science degree in a non-engineering or non-scientific discipline and a record of at least eight years of experience in work of a character indicating that the candidate is competent to perform STA functions.

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- Successful completion of the State of Texas Engineer-In-Training (EIT Examination).
- c. Professional Engineer's License.
- d. Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences.
- 3. HL&P will submit, in a forthcoming FSAR amendment, changes to FSAR Appendix 7A, Section I.A.1.1 which would authorize the use of either Option 1 (SRO/STA dual role position) or Option 2 (STA position) to meet the engineering expertise on shift requirements. This would allow the use of Option 1 on one or more shifts given that personnel qualify to fill the dual role position in the future.

If you should have any questions on this matter, please contact Mr. P. L. Walker at (512) 972-8420.

Very truly yours,

M. R. Wisenburg

Manager Nuclear Licensing

MRW/FAW/ljm

cc:

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