

From: [Ramirez, Frances](#)
To: tjhammons@stpegs.com
Subject: Request for Information for the Problem Identification and Resolution Inspection at STP Nuclear Operating Company
Date: Tuesday, April 5, 2022 1:16:00 PM
Attachments: [2022 STP PIR Request for Information.docx](#)

Mr. Hammons,

The purpose of this e-mail is to transmit a request for information (RFI) in support of the Problem Identification and Resolution Inspection at STP Nuclear Operating Company. The inspection will be conducted between June 6 and June 24, 2022. The team will prepare for the inspection the week of May 23, 2022, and as such, I request that the information be ready by May 20, 2022.

If you have any questions/concerns regarding this request, please contact me using the information below.

Thank you,

Frances C. Ramírez
Senior Reactor Inspector
Inspection Programs and Assessment Team
Ph: 817-200-1520

Information Request
Biennial Problem Identification and Resolution Inspection
STP Nuclear Operating Company
April 5, 2022

Inspection Report: 50-498 and 50-499/2022010
Inspection Dates: June 6-10 and June 20-24, 2022

If warranted by the COVID-19 pandemic conditions within the state of Texas, this inspection may be conducted remotely or in a hybrid format.

This inspection will cover the period from November 5, 2020, through June 24, 2022. All requested information is limited to this period or to the date of this request unless otherwise specified. To the extent possible, the requested information should be provided electronically in word-searchable Adobe PDF (preferred) or Microsoft Office format. If any information requested is determined to be sensitive, the specific handling of this information should be discussed in advance between the NRC inspectors and the South Texas Project representatives assigned to the Problem Identification and Resolution Inspection to ensure appropriate handling.

Lists of documents (“summary lists”) should be provided in Microsoft Excel or a similar sortable format. Please be prepared to provide any significant updates to this information during the team’s first week of inspection and then as new information becomes available. As used in this request, “corrective action documents” refers to condition reports, notifications, action requests, cause evaluations, and/or other similar documents, as applicable to South Texas Project.

Please provide the following information no later than May 20, 2022:

1. Document Lists

Note: For these summary lists, please include the document/reference number, the document title, initiation date, current status, and long-text description of the issue.

- a. Summary list of all corrective action documents related to significant conditions adverse to quality that were opened, closed, or evaluated during the period
- b. Summary list of all corrective action documents related to conditions adverse to quality that were opened or closed during the period
- c. Summary list of all condition reports related to non-conditions adverse to quality that were opened or closed during the period
- d. Summary list of all apparent cause evaluations (or equivalent) performed during the period; if fewer than approximately 40, provide full documents and attachments
- e. Summary list of all currently open corrective action documents associated with conditions first identified prior to the beginning of the inspection period
- f. Summary list of all corrective action documents that were upgraded or downgraded in priority/significance during the period (these may be limited to those downgraded from, or upgraded to, apparent-cause level or higher)

- g. Summary list of all corrective action documents initiated during the period that identify an adverse or potentially adverse trend in safety-related or risk-significant equipment performance or in any aspect of the station's safety culture.
- h. Summary lists of operator workarounds, operator burdens, temporary modifications, and control room deficiencies (1) currently open and (2) that were evaluated and/or closed during the period; this should include the date that each item was opened and/or closed.
- i. Summary list of all prompt operability determinations or other engineering evaluations to provide reasonable assurance of operability; if fewer than approximately 20, provide full documents and attachments
- j. Summary list of plant safety issues raised or addressed by the Employee Concerns Program (or equivalent) (sensitive information should be made available by appropriate means after discussion with the team lead)

2. Full Documents with Attachments

- a. All root cause evaluations completed during the period; include a list of any planned or in progress
- b. Quality Assurance audits performed during the period
- c. Audits/surveillances performed during the period on the Corrective Action Program, of individual corrective actions, or of cause evaluations
- d. Functional area self-assessments and non-NRC third-party assessments (e.g., peer assessments performed as part of routine or focused station self- and independent assessment activities; do not include INPO assessments) that were performed or completed during the period; include a list of those that are currently in progress
- e. Any assessments of the safety-conscious work environment at South Texas Project including any safety culture survey results; if none performed during the inspection period, provide the most recent
- f. Corrective action documents generated during the period associated with the following:
 - i. NRC findings and/or violations issued to South Texas Project
 - ii. Licensee Event Reports issued by South Texas Project
- g. Corrective action documents generated for the following, if they were determined to be applicable to South Texas Project (for those that were evaluated but determined not to be applicable, provide a summary list):

- i. NRC Information Notices, Bulletins, and Generic Letters issued or evaluated during the period
- ii. Part 21 reports issued or evaluated during the period
- iii. Vendor safety information letters (or equivalent) issued or evaluated during the period
- iv. Other external events and/or operating experience evaluated for applicability during the period
- h. Corrective action documents generated for the following:
 - i. Maintenance preventable functional failures that occurred or were evaluated during the period
 - ii. Adverse trends in equipment, processes, procedures, or programs that were evaluated during the period
 - iii. Action items generated or addressed by offsite review committees during the period

3. Logs and Reports

- a. Corrective action performance trending/tracking information generated during the period and broken down by functional organization (if this information is fully included in item 3.b, it need not be provided separately)
- b. Current system health reports, Management Review Meeting package, or similar information; provide past reports as necessary to include greater-than-or-equal to 12 months of metric/trending data
- c. Radiation protection event logs during the period
- d. Security event logs and security incidents during the period (sensitive information should be made available during the team's first week—do not provide electronically) – Handling of this item will need additional discussion
- e. Employee Concerns Program (or equivalent) logs (sensitive information should be made available during the team's first week of inspection—do not provide electronically)
- f. List of training deficiencies, requests for training improvements, and simulator deficiencies for the period

Note: For item 3.c–3.d, if there is no log or report maintained separate from the corrective action program, please provide a summary list of corrective action program items for the category described.

4. Procedures

Note: For these procedures, please include all revisions that were in effect at any time during the period.

- a. Corrective action program procedures, to include initiation and evaluation procedures, operability determination procedures, cause evaluation procedures, and any other procedures that implement the corrective action program at South Texas Project, including applicable corporate procedures
- b. Quality Assurance program procedures (specific audit procedures are not necessary)
- c. Employee Concerns Program (or equivalent) procedures
- d. Procedures that implement/maintain a Safety Conscious Work Environment
- e. Conduct of Operations procedure (or equivalent) and any other procedures or policies governing control room conduct, operator burdens and workarounds, etc.
- f. Maintenance rule procedures and any procedures implementing any portion of the maintenance rule at South Texas Project
- g. Operating experience program procedures and any other procedures or guidance documents that describe the site's use of operating experience information
- h. Part 21 Program procedures

5. Other

- a. List of risk-significant components and systems, ranked by risk worth; if the list uses system designators, provide a list of the associated equipment/system names
- b. List of structures, systems and components and/or functions that were in maintenance rule (a)(1) status or evaluated for (a)(1) status at any time during the inspection period; include dates and results of expert panel reviews and dates of status changes
- c. Organization charts for plant staff and long-term/permanent contractors
- d. Electronic copies of the Updated Final Safety Analysis Report (or equivalent), technical specifications, and technical specification bases, if available
- e. Table showing the number of corrective action documents (or equivalent) initiated during each month of the inspection period, by screened significance
- f. For each day the team is inspecting,
 - i. Planned work/maintenance schedule for the station
 - ii. Schedule of management or corrective action review meetings (e.g. operations focus meetings, condition report screening meetings,

Corrective Action Review Boards, Management Review Meetings, challenge meetings for cause evaluations, etc.)

- iii. Agendas and materials for these meetings

Note: Please provide the items listed in 5.f on a daily basis

All requested documents should be provided electronically (e.g., Certrec's IMS) where possible.

Frances Ramirez
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