



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

November 1, 1999
NOC-AE-000691
File No.: G25
10CFR50
STI: 30978463

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Comprehensive Cultural Assessment

- References:
1. Letter from Ashok A. Thadani to W.T. Cottle dated June 9, 1998 (AE-NOC-000166)
 2. Letter from W.T. Cottle to Ellis W. Merschoff dated September 15, 1998 (NOC-AE-000300)
 3. Letter from Joseph I. Tapia to William T. Cottle dated September 24, 1999 (AE-NOC-000516)

Dear Mr. Merschoff;

Reference 1 transmitted the License Conditions accepted by the STP Nuclear Operating Company to resolve Enforcement Action EA 97-341. License Condition 1, which addresses planned STPNOC Comprehensive Cultural Assessments, states, in part:

The first assessment is scheduled for the second quarter of 1998 and will be performed at least three more times at intervals of 18 to 24 months. Annual 'mini' surveys will be conducted and shall include, but not be limited to, annual surveys through at least the year 2002.

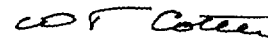
In accordance with the provisions of Reference 1, STPNOC requests that the Regional Administrator, Region IV, relax, in writing, the above condition. Specifically, STPNOC requests that mini-surveys not be required in any year in which a full-scale assessment is performed. The reason for this request is to avoid performing two assessments in the same year. Experience has demonstrated that the outcome and value of a survey will be significantly impacted if it is conducted so soon after an earlier survey.

STPNOC proposes a schedule of three more full assessments and two mini-surveys to fulfill our commitment. A timeline for the proposed Comprehensive Cultural Assessments is shown in Attachment 1. The schedule is designed to maximize the effectiveness of the assessments and mini-surveys. STPNOC believes the proposed schedule meets the intent of the original License Condition. Details of the proposed schedule were discussed with members of your staff in a meeting held on September 23, 1999, in the NRC Region IV offices (Reference 3).

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In addition, License Condition 1 requires that the Regional Administrator be informed of the groups to be surveyed during the upcoming mini-survey. By this letter we are informing you that we plan to survey personnel in each of the Priority 1 and 2 groups identified in Attachment 2. These groups were identified in the August 1998 Comprehensive Cultural Assessment, as described in the Executive Summary contained in Reference 2. This mini-survey will be conducted on or about December 6, 1999.

If there are any questions regarding this matter, please contact Mr. M. A. McBurnett at (361) 972-7206 or me at (361) 972-8434.



W. T. Cottle
President and
Chief Executive Officer

kaw

- Attachment: 1) Comprehensive Cultural Assessment (Proposed Timeline)
2) Priorities for Organizational Validation, Intervention or Remediation

cc:

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

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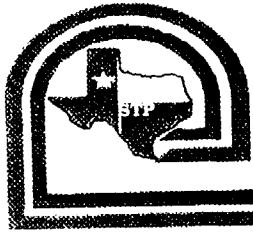
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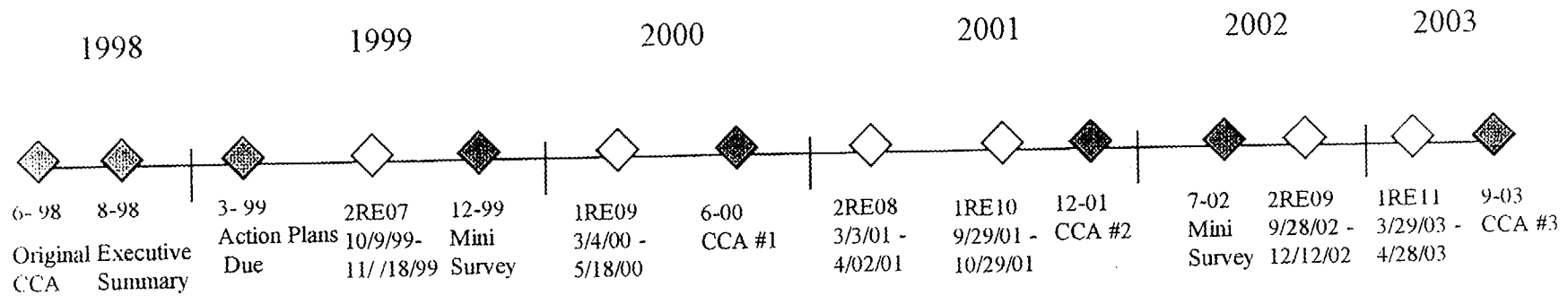
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ATTACHMENT 1

Comprehensive Cultural Assessment (Proposed Timeline)



COMPREHENSIVE CULTURAL ASSESSMENT (PROPOSED TIMELINE)



“The first assessment is scheduled for the second quarter of 1998 and will be performed at least three more times at intervals of 18 to 24 months. Annual “mini” surveys will be conducted and shall include, but not be limited to, annual surveys through at least the year 2002.”

Assumptions:

Three more Comprehensive Cultural Assessments (every 18-24 months)
Annual Mini Survey will not be conducted in same year as CCA

Green	Completed
Blue	Future
Yellow	Outages

ATTACHMENT 2

1999 Mini-Survey Organizations

1999 MINI SURVEY ORGANIZATIONS	
PRIORITY	ORGANIZATIONS
1	Health Physics Nuclear Plant Protection Design Engineering: Electrical I&C Unit 2 Electrical Maintenance Systems Engineering: Reliability Engineering Design Engineering: Technical Support
2	Unit 1 Plant Operations Design Engineering: Mechanical/Civil