

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project, Units 1 and 2

Dockets: 50-498
50-499
Operating Licenses: NPF-76
NPF-80

During an NRC team inspection conducted on September 18-22, 1989, two violations of NRC requirements were identified. The violations involved the failure to ensure the environmental qualification of electrical equipment and the failure to follow plant procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violations are listed below:

A. Failure to Ensure Qualification

Paragraph (a) of 10 CFR 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants," requires licensees to establish a program for qualifying certain electrical equipment.

Paragraph (e) of 10 CFR 50.49 requires the program to include submergence considerations if the equipment is subject to being submerged.

Paragraph (f) of 10 CFR 50.49 requires that (environmental) qualification of each component must be based on testing or experience with identical equipment, or with similar equipment with a supporting analysis, to show that the equipment to be qualified is acceptable.

Contrary to the above:

1. A motor operated valve (B1S1-MOV-0039B, ECCS Accumulator Outlet), which could be required to be repositioned following an accident, had electrical cabling for power and indication which was subject to submergence. This cabling had not been qualified for postaccident submergence.
2. A failed gasket existed on motor operated Valve D1AF-MOV-0514 as evidenced by the existence of moisture intrusion. In addition, the grease relief on this motor operated valve actuator was broken off. These conditions resulted in the actuator being in an unqualified condition.

This is a Severity Level IV violation. (Supplement 1)(498/8934-03)

B. Failure to Follow Procedures

Criteria V of Appendix B to 10 CFR Part 50 requires activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance and be accomplished in accordance with those instructions, procedures, or drawings.

Paragraph 6.1 of the "Specification for Cable Splicing, Termination, and Supports," 5E189ES1004, Revision 10, dated April 26, 1988, lists the requirements for forming and supporting cables and conductors, including the minimum bend radius allowable;

Paragraph 8.2 of the above specification lists methods of electrical connection to be utilized inside the reactor containment building in lieu of terminal blocks (TBs) but allows the use of TBs in vendor supplied equipment if supplied by the vendor for the specific equipment and utilized in a manner approved or qualified by the vendor. The vendor (Limitorcue Test Report B0009) qualified certain equipment utilizing alternate TB connection points; and

Section 6.5 of Station Procedure OPMP02-NZ-0053, "Raychem Insulation Application," Revision 1, dated January 12, 1988, provides the requirements for the proper selection of shims and insulating sleeves for making bolted connection splices.

Contrary to the above:

1. Wires connected to the TB inside motor operated Valve A1SI-MOV-0039A were found to be bent greater than the minimum bend radius allowable.
2. Wires were connected to adjacent TB points inside motor operated Valve D125-MOV-0514 instead of alternate points specified in the vendor's test report. In addition, postinstallation inspections incorrectly documented that the wires were connected in accordance with the vendor's requirements.
3. The splice connections for Flow Transmitter N1SI-FT-0901 were not installed using the shims necessary to provide a properly qualified configuration.

This is a Severity Level IV violation. (Supplement 1)(498/8934-04; 499/8934-04)

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this day of

1989