

# The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

October 23, 1980

ST-HL-AE-564

SFN: C-0570

Mr. W. C. Seidle, Chief  
Reactor Construction & Engineering  
Support Branch  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76012

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION  
RESPONSE TO NRC INSPECTION FINDINGS  
DOCKET NOS. 50-498/80-18 AND 50-499/80-18

Dear Mr. Seidle:

The following is our response to the items of noncompliance identified in IE Inspection Report Nos. 50-498/80-18 and 50-499/80-18, dated September 19, 1980.

A. FAILURE TO DEVELOP APPROPRIATE PROCEDURES TO ASSURE TRACEABILITY OF  
EMBED MATERIAL

CORRECTIVE ACTION

Procedures have existed in the past to control embed material. However, no procedures existed to require that QC preplacement inspectors check and document proper embed control prior to concrete placement. Procedure CCP-25, revision 2, incorporated requirements for QC inspectors to verify that embeds are Category I prior to concrete placement.

RECURRENCE CONTROL

The issuance of the revised procedure and training on the requirements will ensure that proper control of embeds is maintained in the future.

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Mr. W. C. Seidle

Page 2

October 23, 1980

B. FAILURE TO ASSURE THAT PURCHASED MATERIAL CONFORMS TO PROCUREMENT DOCUMENTS

CORRECTIVE ACTION

An extensive inspection effort has taken place concerning the ceramic arc shields remaining after the welding process. Over 300,000 inspections have been made. Results of inspections are being presented in the interim reports related to the 10CFR50.55(e) item on this subject. In summary, a very small percentage of rejectable studs has been found and is being dispositioned by the nonconformance system.

RECURRENCE CONTROL

A memorandum has been issued to all source inspectors to visually inspect all stud welds to ensure removal of the ceramic arc shields and to ensure that the welds meet AWS D1.1 requirements.

C. FAILURE TO RESPOND TO B&R AUDITS

CORRECTIVE ACTION

Audit deficiencies addressed in Audit ST-36 have been satisfactorily responded to with the exception of one civil item concerning a backfit program and two generic items requiring additional responses. A review has been made of all B&R internal audit files to identify additional areas where delinquent response letters were not issued per the procedure in effect at the time. The review showed that several other instances have occurred in which delinquent notices had not been sent within the time required by the procedure. Required actions have now been taken. A current audit procedure ST-QAP-18.1 (effective July 22, 1980) and recent management emphasis on the importance of responsiveness to audits have reduced this type of deficiency which was prevalent in the period of March--July, 1980. The management emphasis was stressed in a recent Project Review Meeting by the HLGP Project Manager.

RECURRENCE CONTROL

The B&R QA Audit Manager presents the status and identification of delinquent Audit Deficiency Reports, including the identification of responsible organizations, in monthly QA Management Review Board meetings held at the site.

Mr. W. C. Seidle

Page 3

October 23, 1980

Items of impasse denoted during the conduct of an audit and resulting resolution process are escalated to higher management of the auditing and audited organizations for resolution in accordance with the project management policy procedure for resolving disputes. In addition, members of the B&R QA Audit Section will be reinstructed on the importance of following Audit Program Procedures and use of response tracking systems to ensure compliance.

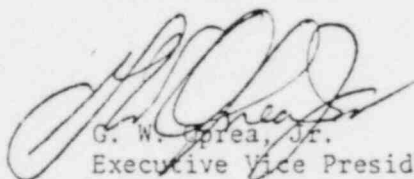
These actions along with Project Management's continued emphasis to the audited organization; on the importance of providing satisfactory responses to audit findings within the allowed time period should prevent recurrence of this violation.

DATES WHEN FULL COMPLIANCE WILL BE ACHIEVED

- A. Full compliance has been accomplished.
- B. Full compliance has been accomplished.
- C. Full compliance including additional training will be accomplished by November 30, 1980.

If you have any questions regarding these commitments, please contact me.

Very truly yours,



G. W. Greer, Jr.  
Executive Vice President

GWO:cf

Houston Lighting & Power Company

cc: D. G. Barker  
Howard Pyle  
R. L. Waldrop  
H. R. Dean  
D. R. Beeth  
J. D. Parsons  
G. B. Painter  
L. K. English  
A. J. Granger  
R. A. Frazar  
J. R. Sumpter  
L. R. Jacobi  
H. S. Phillips  
J. O. Read (Read-Poland, Inc.)  
M. D. Schwarz (Baker & Botts)  
R. Gordon Gooch (Baker & Botts)  
J. R. Newman (Lowenstein, Newman, Reis, Axelrad & Toll)  
J. R. Geurts (B&R)  
J. L. Hawks (B&R)  
R. H. Leasburg (B&R)  
W. J. Friedrich (B&R)  
A. H. Geisler (B&R)

Nuclear Regulatory Commission  
Washington, D. C. 20555

M. L. Borchelt  
Executive Vice President  
Central Power & Light Company  
P. O. Box 2121  
Corpus Christi, Texas 78403

R. L. Range  
Central Power & Light Company  
P. O. Box 2121  
Corpus Christi, Texas 78403

R. L. Hancock  
Director of Electrical Utilities  
City of Austin  
P. O. Box 1088  
Austin, Texas 78767

T. H. Muehlenbeck  
City of Austin  
P. O. Box 1088  
Austin, Texas 78767

J. B. Poston  
Assistant General Manager of Operations  
City Public Service Board  
P. O. Box 1771  
San Antonio, Texas 78296

Houston Lighting & Power Company

A. vonRosenberg  
City Public Service Board  
P. O. Box 1771  
San Antonio, Texas 78296

Charles Bechoefer, Esquire  
Chairman, Atomic Safety & Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. James C. Lamb, III  
313 Woodhaven Road  
Chapel Hill, North Carolina 27514

Dr. Emmeth A. Luebke  
Atomic Safety & Licensing Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Steven A. Sinkin, Esquire  
116 Villita Street  
San Antonio, Texas 78205

Citizens for Equitable Utilities  
c/o Ms. Peggy Buchorn  
Route 1, Box 432  
Brazoria, Texas 77422

Richard W. Lowerre, Esquire  
Assistant Attorney General for the State of Texas  
P. O. Box 12548  
Capitol Station  
Austin, Texas 78711

Bernard M. Bordenick  
Hearing Attorney  
Office of the Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

STP RMS