

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

April 2, 1990

ST-HL-AE-3419

File No.: G26

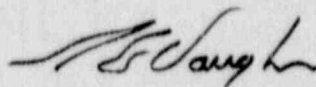
10CFR50.73

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-498
Licensee Event Report 90-003 Regarding a
Failure to Perform a Technical Specification
Required Surveillance Due to a Deficient Procedure

Pursuant to 10CFR50.73, Houston Lighting & Power Company (HL&P) submits the attached Licensee Event Report (LER 90-003) regarding a failure to perform a Technical Specification required surveillance due to a deficient procedure. This event did not have any adverse impact on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or myself at (512) 972-7921.



G. E. Vaughn
Vice President
Nuclear Operations

BEM/n1

Attachment: LER 90-003 (South Texas, Unit 1)

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PDR ADOCK 05000498
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A Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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Revised 12/15/89

LICENSEE EVENT REPORT (LER)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED GMB NO 3150-010M
EXPIRES 8/31/88

FACILITY NAME (1) DOCKET NUMBER (2) PAGE (3)

South Texas, Unit 1 0 5 0 0 0 4 9 8 1 OF 0 3

TITLE (4) 0 5 0 0 0 4 9 9

Failure to Perform a Technical Specification Required Surveillance Due to a Deficient Procedure

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES
03	01	90	90	003	00	04	02	90	South Texas, Unit 2
								DOCKET NUMBER(S)	
								0 5 0 0 0 4 9 9	

OPERATING MODE (9) THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)

POWER LEVEL (10) 20.402(b)

100 20.406(a)(1)(i)

<input type="checkbox"/>	20.406(a)(1)(ii)	<input type="checkbox"/>	20.406(e)	<input type="checkbox"/>	50.73(a)(2)(iv)	<input type="checkbox"/>	73.71(b)
<input type="checkbox"/>	20.406(a)(1)(iii)	<input type="checkbox"/>	50.36(c)(1)	<input type="checkbox"/>	50.73(a)(2)(v)	<input type="checkbox"/>	73.77(c)
<input type="checkbox"/>	20.406(a)(1)(iv)	<input checked="" type="checkbox"/>	50.36(c)(2)	<input type="checkbox"/>	50.73(a)(2)(vii)	OTHER (Specify in Abstract 04.10w and in Text, NRC Form 366A)	
<input type="checkbox"/>	20.406(a)(1)(v)	<input type="checkbox"/>	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(viii)(A)		
<input type="checkbox"/>	20.406(a)(1)(vi)	<input type="checkbox"/>	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(viii)(B)		
<input type="checkbox"/>		<input type="checkbox"/>	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(ix)	<input type="checkbox"/>	

NAME LICENSEE CONTACT FOR THIS LER (12)

Charles Ayala - Supervising Licensing Engineer TELEPHONE NUMBER

5 1 2 9 7 2 - 8 6 2 8

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) EXPECTED SUBMISSION DATE (15)

NO MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On February 22, 1990, Units 1 and 2 were in Mode 1 at 100 percent power. During a review of surveillance procedures by an NRC Resident Inspector, it was discovered that some valves in the Component Cooling Water (CCW) System were not subjected to a Technical Specification required position verification once per 31 days. Further review by HL&P identified additional valves, and based upon discussions with the NRC this event was determined to be a violation of Technical Specification 4.7.3 on March 1, 1990. The cause of this event was a misinterpretation of the requirements of Technical Specification 4.7.3 during initial procedure development. The deficient surveillance procedure has been revised and other procedures which verify valve lineups to satisfy Technical Specifications will be reviewed.

NL.LER90003.U1

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) DOCKET NUMBER (2) PAGE (3)
 South Texas, Unit 1 0 5 0 0 0 4 9 8 1 OF 0 3

TITLE (4) DOCKET NUMBER (2) PAGE (3)
 Failure to Perform a Technical Specification Required Surveillance Due to a Deficient Procedure 0 5 0 0 0 4 9 8 1 OF 0 3

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES
03	01	90	90	003	00	04	02	90	South Texas, Unit 2
								DOCKET NUMBER(S)	
								0 5 0 0 0 4 9 9	
								0 5 0 0 0	

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

OPERATING MODE (8) 1	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 60.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
POWER LEVEL (10) 100	<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 60.36(c)(1)	<input type="checkbox"/> 60.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 60.36(c)(2)	<input type="checkbox"/> 60.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 356A)
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 60.73(a)(2)(i)	<input type="checkbox"/> 60.73(a)(2)(viii)(A)	
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 60.73(a)(2)(ii)	<input type="checkbox"/> 60.73(a)(2)(viii)(B)	
	<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 60.73(a)(2)(iii)	<input type="checkbox"/> 60.73(a)(2)(ix)	

NAME LICENSEE CONTACT FOR THIS LER (12)
 Charles Ayala - Supervising Licensing Engineer TELEPHONE NUMBER
AREA CODE 5 1 2 9 7 2 - 8 6 2 8

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On February 22, 1990, Units 1 and 2 were in Mode 1 at 100 percent power. During a review of surveillance procedures by an NRC Resident Inspector, it was discovered that some valves in the Component Cooling Water (CCW) System were not subjected to a Technical Specification required position verification once per 31 days. Further review by HL&P identified additional valves, and based upon discussions with the NRC this event was determined to be a violation of Technical Specification 4.7.3 on March 1, 1990. The cause of this event was a misinterpretation of the requirements of Technical Specification 4.7.3 during initial procedure development. The deficient surveillance procedure has been revised and other procedures which verify valve lineups to satisfy Technical Specifications will be reviewed.

NL.LER90003.U1

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) South Texas, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8	PAGE (3) 1 OF 0 3
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TITLE (4) Failure to Perform a Technical Specification Required Surveillance Due to a Deficient Procedure

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
03	01	90	90	003	00	04	02	90	South Texas, Unit 2		0 5 0 0 0 4 9 9
0 5 0 0 0											

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)									
POWER LEVEL (10) 100	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)						
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(e)						
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.30(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)								

LICENSEE CONTACT FOR THIS LER (12)

NAME Charles Ayala - Supervising Licensing Engineer	TELEPHONE NUMBER 5 1 2 9 7 2 - 8 6 2 8
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	

SUPPLEMENTAL REPORT EXPECTED (14)	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO			

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single space typewritten lines) (16)

On February 22, 1990, Units 1 and 2 were in Mode 1 at 100 percent power. During a review of surveillance procedures by an NRC Resident Inspector, it was discovered that some valves in the Component Cooling Water (CCW) System were not subjected to a Technical Specification required position verification once per 31 days. Further review by HL&P identified additional valves, and based upon discussions with the NRC this event was determined to be a violation of Technical Specification 4.7.3 on March 1, 1990. The cause of this event was a misinterpretation of the requirements of Technical Specification 4.7.3 during initial procedure development. The deficient surveillance procedure has been revised and other procedures which verify valve lineups to satisfy Technical Specifications will be reviewed.

NL.LER90003.U1

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) South Texas, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8 9 0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	0 0 3	0 0	0 2	OF	0 3

TEXT if more space is required, use additional NRC Form 366A's (17)

DESCRIPTION OF EVENT:

On February 22, 1990, Units 1 and 2 were in Mode 1 at 100 percent power. During a review of surveillance procedures by an NRC Resident Inspector, it was discovered that some valves in the Component Cooling Water (CCW) System were not subjected to a periodic inspection of valve position. This was an apparent violation of Technical Specification 4.7.3a which requires that each outside containment valve in the CCW system servicing safety-related equipment which is not locked, sealed or secured in position be verified to be in the correct position at least once every 31 days. The inspector initially identified 7 valves which were not listed in surveillance procedures. Upon further investigation, HL&P found another 20 valves which were not included in surveillance procedures. Based on discussions with the NRC resident inspectors this condition was determined to be reportable on March 1, 1990. The NRC was notified at 1319 hours on March 2, 1990.

The valves which were omitted from the surveillance procedure supply CCW to the centrifugal charging pumps and the spent fuel pool coolers. The charging pumps are required during normal plant operation to maintain Reactor Coolant System inventory and chemistry and to provide seal injection to the Reactor Coolant Pumps. Each centrifugal charging pump and spent fuel pool cooler is equipped with CCW temperature and flow instruments which alarm in the control room if flow is lost. Their operability is therefore, verified more frequently than required by Technical Specification 4.7.3a through normal operation. The surveillance required by Technical Specification 4.7.3a is intended to ensure that those essential components which normally are idle have CCW aligned to support the performance of their safety function when challenged. At the time the surveillance procedure was written, Technical Specification 4.7.3a was interpreted to not include safety related loads which are utilized during normal plant operation.

CAUSE OF EVENT:

The cause of this event was a misinterpretation of Technical Specification 4.7.3a which resulted in the omission of CCW supply valves to the centrifugal charging pumps and spent fuel pool coolers from the CCW valve lineup surveillances.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) South Texas, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 0	- 0 0 3	- 0 1 0	0 3	OF 0 3

TEXT (if more space is required, use additional NRC Form 366A's) (17)

ANALYSIS OF EVENT:

Failure to perform a Technical Specification required surveillance is reportable pursuant to 10CFR50.73(a)(2)(i)(B). The CCW valves which were not included in the surveillance procedure supplied the centrifugal charging pumps and the spent fuel pool coolers. The centrifugal charging pumps are required to maintain RCS inventory and chemistry and the spent fuel pool coolers are required to maintain spent fuel temperature at an acceptable level; therefore, their operability is confirmed through normal operation more frequently than required by the valve lineup verification specified by Technical Specification 4.7.3.a. The South Texas Project utilizes separate High Head Safety Injection Pumps for high pressure emergency core cooling, the centrifugal charging pumps are not engineered safety features required for accident mitigation. Failure to perform the surveillance had no safety significance in this case.

CORRECTIVE ACTION:

The following corrective actions are being taken as a result of this event:

1. The CCW valve position surveillance procedures have been revised to verify the correct position of CCW valves servicing safety-related equipment that are not locked, sealed or otherwise secured in position.
2. A review will be performed of surveillance procedures for other Technical Specifications which require valve lineup verification. This review will be completed by July 15, 1990.

Additional Information:

A previous similar event was reported under Unit 1 LER 87-026 regarding failure to perform required testing due to a Technical Specification misinterpretation.

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