

The Light company

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

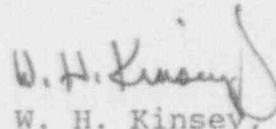
April 2, 1993
ST-HL-AE-4388
File No.: G02.04
10CFR2.201

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

South Texas Project
Unit 1 and 2
Docket Nos. STN 50-498; STN 50-499
Reply to Notice of Violation 9235-02
Regarding Failure to Promptly Identify
and Correct Conditions Adverse to Quality

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9235-02 dated March 3, 1993, and submits the attached reply. HL&P will provide a supplemental report on this Notice of Violation by May 11, 1993.

If you have any questions, please contact Mr. A. W. Harrison at (512) 972-7298 or me at (512) 972-7921.


W. H. Kinsey, Jr.
Vice President
Nuclear Generation

JC/pla

Attachment: Reply to Notice of Violation 9235-02

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Project Manager on Behalf of the Participants in the South Texas Project

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ST-HL-AE-4388
File No.: G02.04
Page 2

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REPLY TO NOTICE OF VIOLATION 9235-02

I. Statement of Violation:

Criterion XVI to 10 CFR 50, Appendix B, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. Procedure OPGP03-ZX-0002, Revision 0, "Corrective Action Program," Section 4.1, Station Problem Report Instruction, requires that, "any person at STPEGS who identifies or becomes aware of a Condition Adverse to Quality (CAQ) or Significant Condition Adverse to Quality (SCAQ) SHALL promptly document the occurrence using an SPR Form." Four examples of violating these requirements are stated below:

1. Contrary to the above, a station problem report was not promptly initiated to document the foreign material (rust like particles) found on the Emergency Diesel Generator 23 fuel oil strainers on December 4, 1992. This nonconforming condition was identified during the performance of Service Request DO-186915 to replace the strainers.
2. Contrary to the above, prompt corrective actions were not initiated to correct equipment deficiencies with Essential Chiller 21A. Plant Equivalency Change CH-178119 was initiated in June 1992 to correct a condition which permitted the upper oil reservoir to migrate to the lower reservoir, requiring the essential chiller to be declared inoperable in accordance with Technical Specification 3.7.14. On December 9, 1992, the Essential Chiller 21A was declared inoperable because the essential chiller did not have sufficient indicated oil level showing in the upper reservoir. Plant Equivalency Change CH-178119 had not been initiated and no date had been established for implementing the plant equivalency change.
3. Contrary to the above, as of December 17, 1992, the licensee had not identified the cause for the repetitive problems with Auxiliary Feedwater Turbine 24 overspeed trip mechanism and had taken no corrective actions to preclude the recurrence of the problem.

I. Statement of Violation: (cont'd)

4. Contrary to the above, the corrective action taken to a violation documented in NRC Inspection Report 50-498/91-11; 50-499/91-11 involving individuals working more than 72 hours in any 7-day period, was not adequate to preclude repetition. During the inspection, four individuals were identified to have exceeded 72 hours worked in a 7-day period without plant manager approval. One occurrence involved an instrumentation and controls technician, with three additional occurrences involving electrical maintenance personnel.

These four examples constitute one Severity Level IV violation. (Supplement I) (498;499/9235-02)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred, but does not agree that the fuel oil strainer example represents a non-conforming condition.

III. Reason for Violation:

The cause for the second example, essential chiller modifications, is still being evaluated. HL&P will provide a supplemental report describing both the cause and corrective actions by May 11, 1993.

The cause of the third example, Auxiliary Feedwater Pump 24 overspeed trips, was reported to the NRC via LER 1-93-007.

The fourth example, the adverse trend involving overtime exceedance, was caused by a lack of training on the detailed requirements of the Administrative Technical Specification governing overtime. Most of the exceedances occurred because personnel assumed that the requirement was based on a fixed seven-day schedule instead of a rolling seven-day time period.

IV. Corrective Actions:

The corrective actions involved with the third example, Auxiliary Feedwater Pump 24, have been reported to the NRC via LER 1-93-007.

IV. Corrective Actions: (cont'd)

To correct the fourth example, a memo was issued to Maintenance Department Personnel to reemphasize the STPEGS Overtime Policy. The Overtime Exceedance Policy (OPGP02-ZA-0060) will be replaced by OPGP03-ZA-0116 to clearly define management expectations regarding compliance with Administrative Technical Specification requirements. Training will be conducted on the new procedure. (Completion Date: June 10, 1993.)

The generic implications of this violation have also been considered. The program to analyze and trend equipment history to identify repetitive component degradations and failures will be upgraded to provide for more prompt and effective action to prevent recurrence. (Corrective action will commence by April 15, 1993 and will be completed by December 15, 1993.) Additionally, training will be conducted to increase personnel awareness of the definition of non-conforming conditions and the necessity of prompt corrective action. Appropriate plant procedures will be revised to include specific examples of non-conforming conditions and specific instructions for dealing with non-conforming Service Requests. The Service Request Form will be revised to ensure the clear indication of a non-conforming condition. (Completion Date: June 30, 1993).

V. Date of Full Compliance:

HL&P will be in full compliance on December 15, 1993. In the interim, the necessity for initiating an SPR to fully investigate apparent adverse trends in equipment condition will be emphasized to station personnel.