

APPENDIX A

NOTICE OF VIOLATION

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

Docket Nos. 50-498
50-499

License Nos. NPF-76
NPF-80

During an NRC inspection conducted January 17 through February 27, 1993, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

A. Failure to Adhere to Technical Specifications Because of Inadequate Procedures

1. Technical Specification 3.3.1 requires that inoperable overtemperature/differential temperature channels be placed in the tripped condition within 6 hours when in operational Modes 1 and 2.

Contrary to the above, during the period of January 8-12, 1993, Unit 1 operated in Mode 1 without tripping the inoperable reactor coolant system delta temperature/average temperature loop instrument, RC-430.

2. Technical Specification Table 4.3-2, "Engineered Safety Features Actuation System Instrumentation Surveillance Requirements," states that the High-1 containment pressure channels have to be channel checked each shift when in operational Modes 1 through 4.

Contrary to the above, during the period of February 4-6, 1993, the Unit 1 shift channel check requirement of Table 4.3-2 for containment pressure (High-1) had not been accomplished as required.

These two examples constitute one Severity Level IV violation.
(Supplement I) (498/9304-01)

B. Failure to Maintain Adequate Maintenance Work Instructions

Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained, including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Paragraph 9, includes procedures for performing maintenance. Paragraph 9.a of Regulatory Guide 1.33, Appendix A, recommends, in part, that maintenance that can affect the performance of safety related equipment should be properly preplanned and performed in accordance with documented instructions appropriate to the circumstances.

Contrary to the above, on January 28, 1993, an unplanned Engineered Safety Features actuation occurred because the preventive maintenance work instructions were not appropriate to the circumstances and were not properly performed.

This is a Severity Level IV violation. (Supplement I) (499/9304-02)

C. Failure to Maintain Minimum Shift Staffing

Technical Specification Section 6.2.2.b states, "at least one licensed operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in Mode 1, 2, 3, or 4, at least one licensed senior operator shall be in the control room."

Contrary to the above, on February 14, 1993, the Unit 2 control room was not staffed by a senior reactor operator for 41 seconds while the unit was in Mode 4 operation.

This is a Severity Level IV violation. (Supplement I) (499/9304-03)

Pursuant to the provisions of 10 CFR Section 2.201, Houston Lighting & Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps which have been taken and results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *16th* day of *April* 1993