

The Light company

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

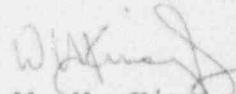
April 30, 1993
ST-HL-AE-4413
File No.: G02.04
10CFR2.201

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498; STN 50-499
Reply to Notice of Violation 9309-01
Regarding Improper Storage of Combustibles

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9309-01 dated March 31, 1993 and submits the attached reply.

If there are 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

JTC/pa

Attachment: Reply to Notice of Violation 9309-01

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U.S. Nuclear Regulatory Comm.
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Reply to Notice of Violation 9309-01

I. Statement of Violation:

Technical Specification 6.8.1.h requires that written procedures shall be established, implemented, and maintained covering the activities of the fire protection program. Procedure OPGP03-ZF-0005, "Use of Flammable Liquids and Gases," Revision 5, paragraph 5.1.5.5, requires that, "point of use flammable/combustible liquids SHALL be placed back into an approved container if not in use for 8 or more hours OR the liquids SHALL be placed in a flammable liquid storage locker while still in the point of use container."

Contrary to the above, on March 10, 1993, a quart bottle of alcohol (flammable), a tube of grease (combustible), and a tube of silicon sealant (combustible) were stored overnight (more than 12 hours) in the Unit 2 safety-related Room 064 near Penetration M-59 in an unapproved container.

This is a Severity Level IV violation (498;499/9309-01) (Supplement 1).

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The individual responsible for staging the material in question was aware of the requirement to ensure that point of use flammable/combustible liquids be placed back into an approved container or placed in a flammable liquid storage locker while still in the point of use container. However, the individual incorrectly believed that the maximum time allowed at the work location, if the materials were not in use, was 24 hours rather than 8 hours as stated in OPGP03-ZF-0005.

IV. Corrective Actions:

The materials were immediately stored properly and applicable information from OPGP03-ZF-0005 was posted and distributed. The Mechanical Maintenance Division Manager discussed the importance of the requirements of the procedure with the responsible journeyman.

IV. Corrective Actions: (Cont'd)

A Maintenance Department memorandum was issued to ensure that the concerns of this violation are communicated to all HL&P and contractor Maintenance Department personnel.

In addition, the following actions have been or will be taken to enhance overall compliance with OPGP03-ZF-0005:

The Mechanical Maintenance Division crew leaders conveyed the concerns of this violation and the requirements of OPGP03-ZF-0005 to craft personnel under their supervision during crew meetings and/or pre-job briefings. The crew leaders for the Electrical, I&C, and MSSD Divisions will conduct similar briefings.

The Mechanical Maintenance Division Pre-job Briefing Check List was revised to include consideration of the use of flammable/combustible liquids and gases. The briefing check lists for the Electrical, I&C, and MSSD Divisions will be revised in a similar manner.

The requirements of OPGP03-ZF-0005 regarding the use and storage of flammable/combustible materials will be included in the General Employee Training requalification program.

V. Date of Full Compliance:

HL&P is in full compliance.