

The Light company

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

June 25, 1993
ST-HL-AE-4488
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
Supplemental Response to Notice of Violation 9236-06
Regarding Failure to Request Relief from ASME Requirements

- Reference: 1) Correspondence from S. L. Rosen, HL&P, to NRC, dated April 2, 1993, "Reply to Notice of Violation 9236-06, Regarding Failure to Request Relief from ASME Requirements" (ST-HL-AE-4402)
- 2) Correspondence from S. L. Rosen, HL&P, to NRC, dated May 11, 1993, "Supplemental Response to Notice of Violation 9236-06, Regarding Failure to Request Relief from ASME Requirements (ST-HL-AE-4436)

Houston Lighting & Power Company (HL&P) provided the initial response to Notice of Violation 9236-06 via Reference 1. Reference 2 provided the results of the analysis of the methodology required to meet the ASME Section XI accuracy and the date of compliance with ASME Section XI for the Essential Cooling Water (EW) system along with the date of full compliance for this violation.

HL&P committed in Reference 2 to completion of the precision calibration for the existing EW instrumentation prior to June 30, 1993.

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

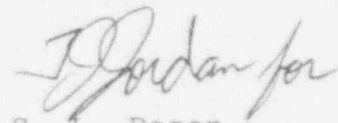
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The establishment of this commitment date assumed that calibration data could be taken by manipulating EW system flow without removing the EW system from service. However, during initial data acquisition it was determined that the EW system must be removed from service to gather the data and perform the calibrations. In order to avoid multiple short duration train outages, the required data will be gathered during upcoming scheduled train outages. The precision calibration, originally scheduled for completion by June 30, 1993, will be completed prior to startup of the affected unit from the current outage. HL&P will be in compliance with the requirements of ASME Section XI upon completion of the precision calibrations.

All changes to this Notice of Violation are denoted by revision bars.

If you have any questions, please contact Mr. C.A. Ayala at (512) 972-8628 or me at (512) 972-7138.



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Attachment: Supplemental Response to Notice of Violation 9236-06

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I. Statement of Violation:

Failure to Request Relief from ASME Code Requirements

10 CFR 50.55a requires that ASME Code Class 3 pumps and valves whose function is required for safety undergo IST which complies with the requirements of ASME Section XI to verify operational readiness, unless relief has been granted.

Article IWP-4110 of ASME Section XI, requires that instruments used in IST be of a quality such that instrument accuracy is within 2 percent of full scale.

Contrary to the above, the essential cooling water flow element installation for the Units 1 and 2 component cooling water heat exchanger had an error of 7 percent of full scale and no relief from the provisions of Section XI was granted.

This is a Severity Level IV violation. (Supplement I)
(498;499/9236-06)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The cause of the event was inadequate management controls to ensure that request for relief from the requirements of ASME Section XI was submitted in a timely manner.

IV. Corrective Actions:

1. An investigation was performed to determine if instrument inaccuracies similar to those discovered in the Essential Cooling Water (EW) System existed in other systems. Similar instrument inaccuracies were discovered in the Essential Chilled Water (CH) and Safety Injection (SI) systems.
2. An evaluation of the data collected during previous ASME Section XI pump testing was conducted and concluded that the EW, CH, and SI instrumentation provided results capable of detecting pump degradation and therefore met the intent of ASME Section XI. System operability for EW, CH, and SI was reviewed and was determined to not be a concern due to sufficient margin existing between the design and the required system flow rates.

IV. Corrective Actions: (con't)

3. For the CH and SI systems, temporary flow measurement devices capable of achieving the required ASME Section XI accuracy will be used until the existing instrumentation is precision calibrated to resolve the inaccuracies. Use of these devices requires revision to the reference value procedures, inservice test procedures, and controlotron calibration specification sheets for the CH and SI systems. These revisions have been completed.
4. For the EW system, the existing instrumentation will be precision calibrated to resolve the inaccuracies. This precision calibration will be completed prior to startup of the affected unit from the current outage. HL&P will be in compliance with the requirements of ASME Section XI upon completion of the precision calibration.
5. Procedures OPGP03-ZE-0021, "Inservice Testing Program for Valves", and OPGP03-ZE-0022, "Inservice Testing Program for Pumps" will be revised to require that relief requests be submitted to the NRC within six months of discovery of the need for the requests. This revision will also require that compensatory actions be taken, as required, until the relief request is granted by the NRC. These procedures will be revised by September 23, 1993.
6. To prevent recurrence, procedure IP-3.04Q, "Inservice Inspection Program", was revised to require that the responsible engineer ensure that the instrumentation used to collect data for inservice testing is accurate to within the tolerances specified in ASME Section XI prior to inclusion of the instrumentation in the testing plan. In addition, procedure OPGP03-ZE-0031, "Design Change Implementation", was revised to require consideration of programmatic impact to the ASME Section XI Pump and Valve Testing Program in the event of a design change to the existing configuration. Also, the +/- 2% instrument accuracy was specifically identified as a potential impact to Section XI equipment on the Design Change checklist.

V. Actions Taken to Address Failure to Meet Commitment:

Upon discovery of the surveillance performance with an unrevised procedure, a Station Problem Report was issued and revision of the applicable procedures and controlotron calibration specification sheet was subsequently completed. A training bulletin was distributed to the appropriate STP personnel concerning this event, emphasizing the need for increased attention to detail with regards to corrective actions associated with NRC commitments. The personnel involved in this failure to meet an NRC commitment were counseled on the importance of attention to detail with regards to corrective actions associated with NRC commitments.

VI. Date of Full Compliance:

The CH and SI systems are in compliance with the requirements of ASME Section XI.

HL&P will be in full compliance prior to startup of Units 1 and 2 from the current outage.