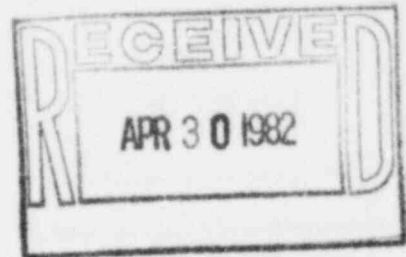


The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

April 26, 1982
ST-HL-AE-824
SFN: V-0100



Mr. John T. Collins
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76012

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
RESPONSE TO NRC INSPECTION FINDINGS
DOCKET NOS. 50-498/82-01 AND 50-499/82-01

Dear Mr. Collins:

The following is our response to the Notice of Violation found in Appendix A of NRC Inspection Report Nos. 50-498/82-01 and 50-499/82-01, dated March 26, 1982:

ITEM 1

"Brown and Root Procedure A040KMECP-9, Revision 6, dated December 2, 1980, 'Control of Welding Materials,' requires that welding material returned without the original flag tag shall be transferred to the Welder Qualification and Training Center (WQTC) for training only.

Contrary to the above, on January 18, 1982, the NRC inspector found in the warehouse storage area, three containers of bare wire electrodes which had been issued from the warehouse, opened, and returned to the warehouse. Each of these containers contained one or more electrodes which had no flag tags."

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

This violation was previously documented on HL&P CAR M-039, Revision 0. The remedial action was to issue the weld filler material in question to the Welder Qualification and Training Center.

In addition to the above, Bechtel Quality Control personnel performed an inspection of welding filler material storage in the material storage area for broken containers and for weld rod lacking identification. The results are documented on NCR P-00001 and are as follows:



1031

Mr. John T. Collins
ST-HL-AE-824
Page 2

Numerous containers of bare wire, which had not been issued to the field, have been opened and portions of the containers are missing. An inspection of the weld wire in these containers has revealed that due to long storage periods the adhesive used for the flagging of the electrodes has deteriorated to the extent that it no longer adheres to the wire. When weld wire is pulled from these containers the flagging falls off, which results in additional unmarked electrodes.

In addition, one container of E-70S-2 (HT# 661B088) weld wire was found to be rusted to the extent that it would not be adequate for issue.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Suspect or questionable weld rod returned from the field will be documented on an NCR for disposition by Bechtel Engineering. This material will be held in quarantine or tagged as appropriate until dispositioned, to prevent its use.

In addition to the above, Ebasco Services Incorporated will by procedure require all weld rod filler materials that have lost heat number or type traceability to be destroyed or removed from the site, and require personnel who issue or use weld filler materials to receive training in the above procedure requirement.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Bechtel material control program was in place March 29, 1982. It should be noted that no material may be issued prior to the release of the applicable engineering design drawings.

Ebasco Services Incorporated will be in full compliance with the above Ebasco commitments prior to the start of safety-related welding operations or by September 1, 1982, whichever occurs first.

It should be further noted that the control of welding filler material is within the scope of audits and surveillances that will be ongoing during construction activity.

ITEM 2

"Brown and Root Procedure ST-QAP-13.1, Revision 0, Amendment 0.1, effective December 15, 1981, 'Receiving Inspection,' requires that when items are determined to be acceptable, they shall be identified with a 'Release for Construction' tag until the material is released from warehouse control.

Mr. John T. Collins
ST-HL-AE-824
Page 3

Contrary to the above, on January 18 and 19, 1982, the NRC inspector found numerous lots of material, including safety-related fasteners, pipe fittings and valves which were stored in the warehouse, but were missing a 'Release for Construction' tag."

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

In accordance with the requirements of Bechtel and Brown and Root procedures, material that is in the controlled storage area is considered acceptable unless documented on an NCR. This material was received and inspected by Brown and Root (B&R), with rejectable material being documented on a B&R NCR. This makes the "Release for Construction" tag a secondary control not necessary to establish initial material acceptability.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

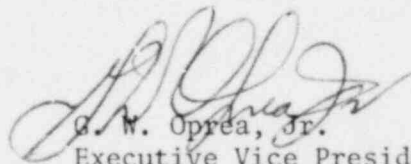
Implementation of the Bechtel material control program does not require tagging of acceptable material. Bechtel's practice is to hold material for receiving inspection, perform receiving inspection, and document any such deviations found during material receiving inspection on an NCR or document deficiency report (as applicable) which is traceable to the item and which is appropriately dispositioned or closed prior to the release of the material for installation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Bechtel material control program was in place March 29, 1982. It should be noted that no material may be issued prior to the release of the applicable engineering design drawings.

If you have any questions regarding these commitments, please contact me.

Very truly yours,



G. W. Oprea, Jr.
Executive Vice President

GWO:cf

cc: G. W. Oprea, Jr.

J. H. Goldberg

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J. W. Williams

J. W. Briskin

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(NRC)

D. E. Sells

(NRC)

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(NRC)

M. D. Schwarz

(Baker & Botts)

R. Gordon Gooch

(Baker & Botts)

J. R. Newman

(Lowenstein, Newman, Reis, & Axelrad)

STP RMS

Director, Office of Inspection & Enforcement

Nuclear Regulatory Commission

Washington, D. C. 20555

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Hearing Attorney

Office of the Executive Legal Director

U. S. Nuclear Regulatory Commission

Washington, D. C. 20555

April 26, 1982

ST-HL-AE-824

Charles Bechhoefer, Esquire

Chairman, Atomic Safety & Licensing Board

U. S. Nuclear Regulatory Commission

Washington, D. C. 20555

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Mr. Ernest E. Hill

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Citizens for Equitable Utilities, Inc.

c/o Ms. Peggy Buchorn

Route 1, Box 1684

Brazoria, Texas 77422

Revision Date 04-19-82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

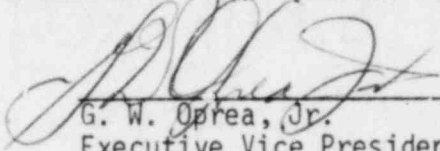
South Texas Project
Units 1 and 2

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Docket Nos. 50-498
50-499

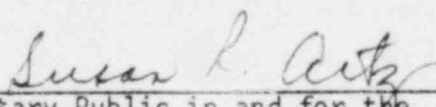
AFFIDAVIT

G. W. Oprea, Jr. being duly sworn, hereby deposes and says that he is an Executive Vice President of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Response to NRC Inspection Findings; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.


G. W. Oprea, Jr.
Executive Vice President

STATE OF TEXAS S
COUNTY OF HARRIS S

Subscribed and sworn to before me, a Notary Public in and for Harris County, Texas this 26th day of April, 1982.


Susan R. Aitz
Notary Public in and for the
State of Texas

My commission expires:

June 30, 1982