

APPENDIX A

NOTICE OF VIOLATION

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

Dockets: 50-498  
50-499

Licenses: NPF-76  
NPF-80

During an NRC inspection conducted January 24 through 28, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Section 7 of Appendix A lists procedures for the control of radioactivity for limiting materials released to the environment.

Regulatory Guide 1.33, Section 1(d) of Appendix A lists administrative controls for procedure adherence.

Licensee Procedure OPGP03-ZA-0010, "Plant Procedure Adherence," Section 4.1.1, states that procedures shall be strictly adhered to when performing plant activities.

Procedure OPGP03-ZX-0002, "Corrective Action Program," Revision 0 (implemented September 9, 1992), requires, in part, in Section 4.1, Station Problem Report (SPR) instructions:

Any person at STPEGS who identifies or becomes aware of a Condition Adverse to Quality (CAQ) SHALL promptly document the occurrence using an SPR form.

Procedure OPGP03-ZX-0002, "Corrective Action Program," Revision 1 (implemented May 26, 1993), requires, in part, in Section 4.1, Station Problem Report instructions:

Any person at STPEGS who identifies or becomes aware of a Deficiency or a Significant Deficiency as specified in Section 1.2 shall write an SPR by following the directions on the SPR Form.

Contrary to the above, the inspectors determined that licensee personnel did not document the following examples of conditions adverse to quality on a Station Problem Report form:

- Radiological environmental monitoring program personnel did not document on a Station Problem Report that an offsite air sample collected in an

- Radiological environmental monitoring program personnel did not document on a Station Problem Report that an offsite air sample collected in an unrestricted area on March 27, 1993, detected the presence of cobalt-58 and cobalt-60.
- Instrumentation & Controls personnel did not documented on a Station Problem Report that meteorological system instruments were found out of tolerance during the August 11, 1993 semiannual surveillance and calibration.

This is a Severity Level IV violation (Supplement I) (498/9405-01; 499/9405-01).

Pursuant to the provisions of 10 CFR 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, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the 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, the Commission may issue an order or a demand for information as to 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 8th day of March 1994.