



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAR - 9 1994

Dockets: 50-498  
50-499  
Licenses: NPF-76  
NPF-80

Houston Lighting & Power Company  
ATTN: William T. Cottle, Group  
Vice President, Nuclear  
P.O. Box 289  
Wadsworth, Texas 77483

SUBJECT: NRC INSPECTION REPORT 50-498/94-07; 50-499/94-07 (NOTICE OF VIOLATION)

This refers to the inspection conducted by Messrs. D. P. Loveless and J. M. Keeton of this office on January 11-20, 1994. The inspection included a review of activities authorized for your South Texas Project, Units 1 and 2, facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, inspection of installed equipment, interviews with personnel, and observations of activities in progress. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, certain activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The first violation is of concern because the as-found condition of your emergency containment sump enclosures did not meet the design basis. This had a potential to impact the operability of the emergency core cooling and containment spray systems. The second violation is of concern because your plant surveillance procedure was inadequate to ensure that inspections of the emergency containment sumps were performed properly. As a result, the Technical Specifications surveillance requirement was not fully implemented.

Although the actual safety significance of the identified violations did not rise to the level of a Severity Level III violation because of the nature of the sump enclosure deficiencies and the South Texas Project three-train, three-sump design, they are of more than minor concern. Emergency containment sump enclosure deficiencies, debris fouling of enclosures, and the effect of debris on safety systems are potentially safety significant. There have been several information notices issued and, more recently, a bulletin addressing identification of either design deficiencies or blockage of sump

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screens or strainers. We believe that there were plenty of opportunities for STP to have identified and corrected any deficiencies prior to this inspection by NRC. One of the contributing causes for the current violations at the South Texas Project, inadequate assessment of industry operating experience, has been a factor in previous violations at the South Texas Project, some of which resulted in escalated enforcement prior to the most recent extended shutdown. We are concerned that failure to adequately address this weakness could lead to a safety significant event in the future. It is my understanding that NRC Information Notice 89-77 and its supplement were not adequately addressed by your staff and that actions recommended by your engineers were not initiated in the plant. A proper assessment of this notice could have resulted in your identification of the sump deficiencies years ago. Please include in your response a discussion of the reasons why this review was deficient and a detailed discussion of any planned corrective actions, including the implementation schedule, to improve the quality of your industry operational experience review program.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The response directed by this letter and enclosed Notice is not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



A. Bill Beach, Director  
Division of Reactor Projects

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report  
50-498/94-07; 50-499/94-07

cc w/enclosure:

Houston Lighting & Power Company  
ATTN: James J. Sheppard, General Manager  
Nuclear Licensing  
P.O. Box 289  
Wadsworth, Texas 77483

City of Austin  
Electric Utility Department  
ATTN: J. C. Lanier/M. B. Lee  
721 Barton Springs Road  
Austin, Texas 78704

City Public Service Board  
ATTN: K. J. Fiedler/M. T. Hardt  
P.O. Box 1771  
San Antonio, Texas 78296

Newman & Holtzinger, P. C.  
ATTN: Jack R. Newman, Esq.  
1615 L Street, NW  
Washington, D.C. 20036

Central Power and Light Company  
ATTN: G. E. Vaughn/T. M. Puckett  
P.O. Box 2121  
Corpus Christi, Texas 78403

INPO  
Records Center  
700 Galleria Parkway  
Atlanta, Georgia 30339-5957

Mr. Joseph M. Hendrie  
50 Bellport Lane  
Bellport, New York 11713

Bureau of Radiation Control  
State of Texas  
1100 West 49th Street  
Austin, Texas 78756

Judge, Matagorda County  
Matagorda County Courthouse  
1700 Seventh Street  
Bay City, Texas 77414

Houston Lighting & Power Company

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Licensing Representative  
Houston Lighting & Power Company  
Suite 610  
Three Metro Center  
Bethesda, Maryland 20814

Houston Lighting & Power Company  
ATTN: Rufus S. Scott, Associate  
General Counsel  
P.O. Box 61867  
Houston, Texas 77208

Shaw, Pittman, Potts & Trowbridge  
ATTN: Joseph R. Egan, Esq.  
2300 N Street, N.W.  
Washington, D.C. 20037

MAR - 9 1994

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan  
 Section Chief (DRP/A)  
 MIS System  
 RIV File  
 R. Bachmann, OGC, MS: 15-B-18  
 A. B. Beach, D/DRP

Resident Inspector  
 Lisa Shea, RM/ALF, MS: MNBB 4503  
 DRSS-FIPS  
 Project Engineer (DRP/A)  
 Section Chief (DRP/TSS)

*NRR comments  
 on cover letter  
 incorporated  
 3/8/94*

RIV:SRI:DRP/A	PE:DRP/A <i>Jm</i>	C:DRP/A <i>J</i>	EO <i>AS</i>	D:DRP <i>B</i>
DPLoveless	MASatorius	WDJohnson	GFSanborn	ABBeach
1/27/94	2/4/94	2/4/94	2/8/94	3/9/94

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