

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 11-20, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion III, states, in part, that measures shall be established to ensure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies, are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, the following five examples of the design basis of the emergency containment sump enclosures not being correctly translated into specifications, drawings, or instructions were identified.

1. The design basis of the emergency containment sump enclosures was not correctly translated into drawings and instructions in that Drawing 312, "Sump Cover Sub-Assembly," as implemented by Pittsburgh-Des Moines Work Package PDM 21258, did not provide sufficient detail to prohibit the construction of six holes that bypassed the sump enclosure screen installed on or about August 20, 1979.
2. The design basis of the emergency containment sump enclosures was not correctly translated into drawings and instructions in that Drawing E5/A, "Sump Erection," as implemented by Work Package PDM 16706, did not provide sufficient detail to prohibit the acceptance of gaps between the emergency sump enclosures and the containment floor. These gaps allowed a pathway that bypassed the trash racks, kick plate, and screens.
3. The design basis of the emergency containment sump enclosure cover was not correctly translated into specifications, drawings, and instructions in that the instructions in Engineering Change Notice Package 88-C-0037 were insufficient to provide a method for plant workers to install vortex breakers within the sumps. This resulted in the workers cutting slots to widen the manways that were not reflected in design drawings.
4. The design basis of the emergency containment sump enclosures was not correctly translated into specifications and instructions in that the enclosure manway covers were free to move within the

manway. This allowed the outside edge of the manway covers to expose gaps in the manway slots greater than the 1/4 inch allowed by the containment spray system design criteria.

5. The design basis of the emergency containment sump enclosures was not correctly translated into drawings in that Design Drawing 3C26-9-S-1525, "Structural Reactor Containment Building S. ST. Liner - Section and Details," indicated a conflict between Section F-F and Detail 9 of the drawing. This resulted in the failure to install a 1/8-inch gasket in the Unit 2 sump enclosures.

This is a Severity Level IV violation. (Supplement I)
(498;499/94007-01)

- B. Technical Specification 4.5.2.d requires that "Each ECCS subsystem shall be demonstrated OPERABLE: ... At least once per 18 months by a visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that sump components (trash racks, screens, etc.) show no evidence of structural distress or abnormal corrosion." This requirement is applicable to Mode 3.

Contrary to the above, on August 12, 1993, licensee personnel had failed to verify within the surveillance interval that the subsystem suction inlets were not restricted by debris and that certain sump components showed no evidence of structural distress or abnormal corrosion prior to taking the Unit 1 reactor into Mode 3.

This is a Severity Level IV violation. (Supplement I)
(498/94007-02)

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 at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps which have been taken and 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, an order may be issued to show cause 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 day of 1994