

# The Light company

Houston Lighting & Power

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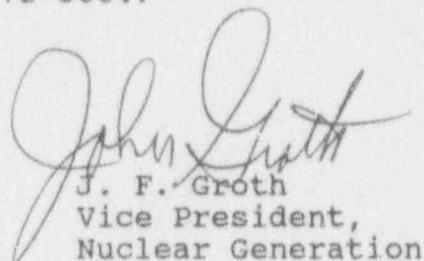
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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project  
Units 1 and 2  
Docket Nos. 50-498; 50-499  
Reply to Notice of Violation 9405-01  
Regarding Identification of Conditions Adverse to Quality

Houston Lighting & Power has reviewed Notice of Violation 9405-01, dated March 8, 1994, regarding two examples of conditions that were not identified as Conditions Adverse to Quality in accordance with the Corrective Action Program and submits the attached reply.

If there are any questions please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8664.

  
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Attachment

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Reply to Notice of Violation 9405-01

I. Statement of Violation:

Technical Specification C.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 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 unrestricted area on March 27, 1993, detected the presence of cobalt-58 and cobalt-60.

- Instrumentation & Controls personnel did not document 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).

Response to Example 1. Radiological Environmental Monitoring Program personnel did not initiate a Station Problem Report for trace levels of cobalt-58 and cobalt-60 in an air sample.

II. Houston Lighting & Power Position:

Houston Lighting & Power concurs that a violation occurred.

III. Reason for Violation:

Radiological Environmental Monitoring Program personnel did not write a Station Problem Report for the trace levels of cobalt-58 and cobalt-60 in the air sample because Station Problem Report 931157 had already been written for the event which caused the anomalies. However, the Station Problem Report that was written for the event did not address these trace levels.

On March 25, 1993, an increase in the airborne activity was noted on a Continuous Air Monitor in the Unit 2 Reactor Containment Building. The increased airborne activity and the resulting actions were documented on Station Problem Report 931157, initiated on April 6, 1993.

Trace levels of cobalt-58 and cobalt-60 were subsequently detected by the Radiological Laboratory in a routine air particulate sample collected outside of the Unit 2 Reactor Containment Building. The South Texas Offsite Dose Calculation Manual table did not specify reportable levels for either cobalt-58 or cobalt-60 and the activities detected were over 1000 times lower than those specified for similar radionuclides. Technical Services Department personnel attributed these trace levels to the event inside the Unit 2 Reactor Containment Building because of increased activity in the Unit Vent coincident with the event.

Cognizant Radiological Environmental Monitoring Program supervision notified the Technical Services Department Manager of the air sample results. Radiological Environmental Monitoring Program supervision, understanding that the trace levels would be addressed in the Annual Radiological Environmental Operating Report, were of minor significance, and were part of the event that had been documented on a Station Problem Report, did not document the trace levels on a separate Station Problem Report. However, the Station Problem Report written for the increased airborne activity inside the Unit 2 Reactor Containment Building did not address the air samples collected outside the Unit 2 Reactor Containment Building.

IV. Corrective Actions:

Houston Lighting & Power has implemented or will implement the following corrective actions to address this violation:

1. Procedure OPGP03-ZR-0039, "Radiological Environmental Monitoring Program", was revised to direct the issuance of a Station Problem Report if anomalous measurements are obtained on Radiological Environmental Monitoring Program samples. This action was completed on April 4, 1994.
2. Cognizant Radiological Environmental Monitoring Program supervision have been apprised of the requirement of procedure OPGP03-ZX-0002 to document anomalous measurements on a Station Problem Report.
3. Radiological Laboratory staff personnel have been directed to identify anomalous Radiological Environmental Monitoring Program sample measurements on a Station Problem Report.
4. Laboratory personnel will evaluate all sample data obtained since initial criticality in order to ensure that a proper investigation was performed and documented for any positive results. This evaluation will be complete and documented in a SPR by April 21, 1994

5. The new revision to procedure OPGP03-ZR-0039 was issued to appropriate personnel as required reading. Completion of this assignment was documented on a signoff sheet. This action was completed on April 5, 1994.
6. The 1993 Annual Radiological Environmental Operating Report will include a discussion of anomalous measurements obtained on 1993 Radiological Environmental Monitoring Program samples. This action will be completed by May 1, 1994.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.

VI. Additional Information:

An initiative is currently in progress which will, upon completion, extensively revise the site corrective action process. Program enhancements will include the establishment of site-wide and departmental-level thresholds for documenting Conditions Adverse To Quality. The new program will provide consistency in documenting problems, while enabling South Texas to better utilize appropriate resources based on the relative significance of the condition identified.

The proposed implementation date for the revised site Corrective Action Program is July 31, 1994.

Response to Example 2. Instrumentation & Controls (I&C) personnel did not initiate a Station Problem Report for out-of-tolerance meteorological instruments.

II. Houston Lighting & Power Position:

Houston Lighting & Power concurs that a violation occurred.

III. Reason for Violation:

This violation occurred because the I&C Divisional Surveillance Coordinator did not submit meteorological instrumentation calibration surveillance packages containing out-of-tolerance as-found data to the Systems Engineering Department for evaluation in a timely manner. Additionally, site personnel relied on an informal mechanism for processing out-of-tolerance calibration data, rather than revising applicable procedures.

Procedure OPGP03-ZE-0004, "Plant Surveillance Program", requires an information Service Request to be generated for calibration surveillances, specifically PSP05 surveillances, which identify out-of-tolerance as-found data. The I&C Divisional Surveillance Coordinator is responsible for generating the information Service Request when out-of-tolerance data is identified.

The use of information Service Requests was discontinued upon revision of procedure OPGP03-ZA-0090, "Work Process Program", on August 24, 1993. Procedure OPGP03-ZM-0016, "Installed Plant Instrumentation Calibration Verification Program", which governs calibration of instruments not governed by procedure OPGP03-ZE-0004, was changed to provide a replacement mechanism for addressing out-of-tolerance calibration data. However, procedure OPGP03-ZE-0004 was not similarly revised, thereby leaving no formal mechanism to address out-of-tolerance calibration data obtained during performance of PSP05 surveillances.

On September 21, 1993, the I&C Divisional Surveillance Coordinator reviewed the calibration data package (OPSP-05-EM-0001) for the meteorological system instruments, which had been performed on August 11, 1993. The I&C Divisional Surveillance Coordinator noted that there were out-of-tolerance data, but did not forward the data to System Engineering for evaluation.

The existence of out-of-tolerance calibration data for meteorological instruments does not automatically constitute a Condition Adverse to Quality. The issuance of a Station Problem Report would be warranted in cases where an evaluation of the out-of-tolerance data by knowledgeable personnel indicated that the error impacts the ability to meet regulatory requirements for meteorological instrumentation. The out-of-tolerance measurements for the cited surveillance have been evaluated and have been determined not to affect the ability to meet the applicable regulatory requirements. Accordingly, those measurements did not represent a condition adverse to quality. However, the fact that the out-of-tolerance measurements had not been evaluated in a timely manner does represent a condition adverse to quality and Station Problem Report 940762 was initiated on March 29, 1994 to document that condition.

IV. Corrective Actions:

Houston Lighting & Power has implemented or will implement the following actions to address this violation:

1. The out-of-tolerance as-found measurements obtained during the performance of OPSP05-EM-0001 were evaluated and did not affect regulatory compliance for meteorological instruments.
2. In early March, eighty-four additional surveillances containing out-of-tolerance data were identified. The eighty-four surveillances had not been forwarded to the Systems Engineering Department. The eighty-four surveillances have since been forwarded to the Systems Engineering Department for evaluation. The surveillance packages initial review indicates that all "as left" data was within the required tolerance, thus no immediate operability concerns were identified.
3. The current I&C Divisional Surveillance Coordinator understands the importance of forwarding out-of-tolerance instrument calibration surveillance data to the Systems Engineering Department.
4. Procedure OPGP03-ZE-0004 was revised on April 7, 1994, to provide a formal mechanism for forwarding out-of-tolerance surveillances to the Systems Engineering Department for evaluation. This revision includes a requirement for the Divisional Surveillance Coordinator to submit a copy of the affected surveillance to the Systems Engineering Department within 30 days of performance. The procedure becomes effective on April 13, 1994.
5. Twenty-eight of the eighty-four surveillance packages have since been processed with no findings. The remaining fifty-six surveillance packages containing out-of-tolerance data will be evaluated by the Systems Engineering Department. Station Problem Reports will be issued for any measurements which constitute a condition adverse to quality. This action will be completed by May 16, 1994. In addition, the Systems Engineering Department will continue to evaluate out-of-tolerance data forwarded to their department.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.

VI. Additional Information:

An initiative is currently in progress which will, upon completion, extensively revise the site corrective action process. Program enhancements will include the establishment of site-wide and departmental-level thresholds for documenting Conditions Adverse To Quality. The new program will provide consistency in documenting problems, while enabling South Texas to better utilize appropriate resources based on the relative significance of the condition identified.

The proposed implementation date for the revised site Corrective Action Program is July 31, 1994.