

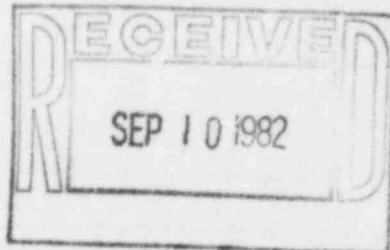
The Light company

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

September 9, 1982

ST-HL-AE-883

File No. G2.4



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

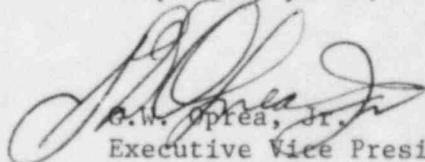
Dear Mr. Collins:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation

Pursuant to the provisions of 10 CFR 2.201 enclosed is Houston Lighting & Power Company's response to the Notice of Violation 50-498/82-02, 50-499/82-02 dated August 11, 1982.

If you should have any questions regarding this matter please contact Mr. Michael E. Powell at (713) 877-3281.

Very truly yours,


G.W. Oprea, Jr.
Executive Vice President

MRW/aa

Attachment

Houston Lighting & Power Company

September 9, 1982

cc: G. W. Oprea, Jr.
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Washington, D. C. 20555

Revision Date 08-23-82

SOUTH TEXAS PROJECT
Response to Notice of Violation
50-498/82-02
50-499/82-02

I. Statement of Apparent Violation

10 CFR 50.55(e) requires that the holder of a construction permit shall notify the Commission of each deficiency found in design and construction, which, if uncorrected could adversely affect the safety of plant operations. The regulation further requires that the holder of the construction permit shall notify the appropriate NRC regional office within 24 hours after the deficiency is found.

The following deficiencies were identified and reported by the applicant:

<u>Title</u>	<u>Date Initial Notification</u>	<u>Date of First Interim Report</u>
"Computer Program Verification" (CPV)	May 8, 1981	June 5, 1981
"Heating, Ventilation and Air Conditioning Design" (HVAC)	May 8, 1981	June 9, 1981

Contrary to the above, these deficiencies which were found by the applicant on or about November 1980 and January 1981, respectively, were not reported to the Region IV office within the required 24 hours.

II. Houston Lighting & Power Company Response

Houston Lighting & Power Company (HL&P) agrees that there was a failure to report the HVAC design deficiency in accordance with the time limit of 10 CFR 50.55(e). HL&P became concerned with the adequacy of the HVAC design around April 1980. However, at that time, the implications of the problem relative to reportability were not recognized. The HL&P employees knowledgeable of this concern did not identify its existence to our Incident Review Committee; accordingly, the problem was not evaluated pursuant to 10 CFR 50.55(e) and, therefore, was not identified as potentially reportable. The deficiency was determined to be potentially reportable pursuant to 10 CFR 50.55(e) based on the detailed findings of the Quadrex Report which became available on May 7, 1981, and subsequently reported to NRC-OIE on May 8, 1981.

HL&P believes that it is not clear that there was a failure to report the CPV deficiency in accordance with the time limits of 10 CFR 50.55(e). HL&P became aware that there might be a problem in CPV relating to Control Room dose calculations but this item was evaluated and determined not reportable pursuant to 10 CFR 50.55(e) in December, 1980. Also in December, 1980 Brown & Root (B&R) orally informed HL&P that a B&R audit had found CPV problems, but did not provide any details. (When issued the B&R written Audit Deficiency Report specifically stated that the CPV problems were not reportable.) As a result, in December, 1980 B&R management was requested to further investigate the matter. In addition, in January 1981, Quadrex was

directed to include CPV in their review. However, HL&P did not have sufficient information to attach safety significance to the CPV problems until the detailed findings of the Quadrex Report became available on May 7, 1981. Therefore, no evaluation of a generic CPV problem relative to reportability or potential reportability pursuant to 10 CFR 50.55(e) could be accomplished until May 7, 1981. HL&P subsequently reported the CPV deficiency to NRC-OIE Region IV on May 8, 1981. Notwithstanding the above described events, it should be emphasized that HL&P has instituted and completed actions as described below that would address any necessary corrective actions.

1) Corrective Steps Which Have Been Taken
And The Results Achieved

As described below, deficiency reporting procedures have been revised and employees have been retrained in order to reduce the potential for a failure to comply with the reporting requirements of 10 CFR 50.55(e).

During the time period following notification of NRC of these deficiencies, HL&P conducted special training to reinstruct personnel in the STP Engineering, Quality Assurance, Nuclear Plant Operations, Nuclear Services and Nuclear Fuels organizations in the identification, evaluation and reporting of deficiencies. The scope, requirements and potential reportability aspects of 10 CFR 50.55(e) were emphasized. On June 12, 1981, the method for internal review of deficiencies was streamlined by requiring deficiencies to be reported directly to the Incident Review Committee (IRC) Chairman for review by the IRC.

HL&P has also recently revised the procedure for identification, evaluation and reporting of deficiencies pursuant to 10 CFR 50.55(e) (Project Licensing Procedure, PLP-02) to further strengthen and clarify HL&P's system for handling potentially reportable problems. HL&P conducted training sessions for all personnel involved in identification, evaluation, or reporting of deficiencies immediately prior to issuance of the revised procedure.

2) Corrective Steps Which Will Be Taken To
Avoid Further Violations

HL&P will hold future training sessions to review the reporting requirements of 10 CFR 50.55(e) in order to instruct new employees in the identification, evaluation, and reporting of deficiencies.

3) Date When Full Compliance Will Be Achieved

HL&P is now in full compliance.