

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 March 10 through April 14, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained, including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 8.b of Appendix A recommends that specific procedures for each surveillance test, inspection, or calibration listed in the Technical Specifications should be written. This requirement was implemented, in part, by Plant Surveillance Procedure OPSP03-SP-0005S, Revision 3, "SSPS Logic Train S Functional Test."

A note in Plant Surveillance Procedure OPSP03-SP-0005S, that precedes Step 5.3.3, stated that, unless noted, all of the following steps are conducted at Protection System Logic Train S, Local Cabinet SSPS-ZRR008, logic test panel.

Plant Surveillance Procedure OPSP03-SP-0005S, Precaution 3.6 required that, if testing was terminated for any reason, the shift supervisor would be notified immediately.

Contrary to the above, the following two examples of failure to follow procedure requirements were identified:

1. On March 10, 1994, reactor operators performed all of Steps 5.3 through 5.17 at Protection System Logic Train R, Local Cabinet SSPS-ZRR001, logic test panel.
2. On March 10, 1994, reactor operators terminated the test prematurely to recover from working on the wrong train and did not inform the shift supervisor.

This is a Severity Level IV violation (Supplement I)(498/94012-01).

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 at the facility that is the subject of this Notice,

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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 *25th* day of *April* 1994