

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 30 through March 12, 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. 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. Item 1 of Appendix A states that the licensee will have administrative procedures to control safety-related activities. This requirement was implemented, in part, by Plant General Procedure OPGP03-ZM-0028, Revision 3, "Erection and Use of Temporary Scaffolding."

Plant General Procedure OPGP03-ZM-0028, Step 4.2.6 states, in part, that the minimum clearance between scaffolding members and equipment shall be in accordance with Item C of the Seismic Separation Control Drawing, Units 1 and 2, 3A01-0-S-10003, Sheet 1. Scaffolding members shall be considered as Group 0 when utilizing this drawing. Item C of Drawing 3A01-0-S-10003, Sheet 1, specifies that a 2-inch minimum separation is needed between Groups 3 and 0 when constructing scaffolds. Drawing 3A01-0-S-10003, Sheet 1, Group 3 includes safety-related piping without specifying the size.

Contrary to the above, on February 23, 1994, the inspector observed a scaffold cross member (Group 0) touching Essential Cooling Water Pump 1A discharge piping (Group 3). Procedure OPGP03-ZM-0028 provided insufficient guidance to assure that personnel constructed the scaffold as required by design requirements.

This is a Severity Level IV violation. (Supplement I)
(498/94009-01)

- B. Technical Specification 6.5.3.1.a requires, in part, that changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure, prior to implementation of the change.

Contrary to the above, on February 25, 1994, licensed operators changed the intent of Plant Surveillance Procedure OPSP03-SP-0009B, Revision 1, "SSPS Actuation Train B Slave Relay Test," as directed in a night order, without the approval of the engineering programs manager, who was the individual authorized to approve the change. The procedure change was performed by marking steps as not applicable that were required to perform an adequate test of the slave relays associated with automatic repositioning of several safety injection valves.

This is a Severity Level IV violation. (Supplement I) (498/9409-02).

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 *25th* day of *April* 1994