

DEC 17 1990

Docket Nos. 50-498/90-31
50-499/90-31
License Nos. NPF-76
NPF-80
EA 90-164

Houston Lighting & Power Company
ATTN: Donald P. Hall, Group
Vice President, Nuclear
P.O. Box 1700
Houston, Texas 77251

Gentlemen:

Thank you for your letter of November 30, 1990, in response to our letter and Notice of Violation dated November 1, 1990. We have reviewed your reply to Violation 498/9031-01; 499/9031-01, and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

cc:
Houston Lighting & Power Company
ATTN: M. A. McBurnett, Manager
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City of Austin
Electric Utility Department
ATTN: J. C. Lanier/M. B. Lee
P.O. Box 1088
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RIV:DRP/DWJ	C:DRP/D <i>df</i>	D:DRP
WBJones;df	ATHowell	SJCollins
12/17/90	12/17/90	12/17/90

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Houston Lighting & Power Company

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City Public Service Board
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P.O. Box 1771
San Antonio, Texas 78296

Newman & Holtzinger, P. C.
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Bureau of Radiation Control
State of Texas
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Austin, Texas 78756

Judge, Matagorda County
Matagorda County Courthouse
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Houston Lighting & Power Company
ATTN: Rufus S. Scott, Associate
General Counsel
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Houston, Texas 77208

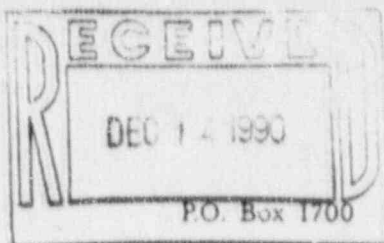
bcc to DMB (IE14)

bcc distrib. by RIV:
R. D. Martin
DRP
DRS
DRSS-RPEPS
RIV File
RSTS Operator

Resident Inspector
Section Chief (DRP/D)
MIS System
Lisa Shea, RM/ALF
R. Bachmann, OGC
Project Engineer (DRP/D)

**The Light
company**

Houston Lighting & Power



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

November 30, 1990

ST-HL-AE-3631

File No.: G02.04

10CFR2.201

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

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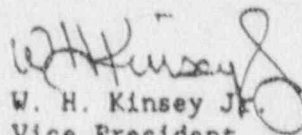
South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Response to Notice of Violation 9031-01 (EA 90-164) Regarding
Violation of Technical Specification due to Exceeding the
Allowable Temperature in the Reactor Coolant System
with one of the High Head Safety Injection Pumps Inoperable

Houston Lighting & Power Company has reviewed Notice of Violation 9031-01 (EA 90-164) dated November 1, 1990. HL&P concurs that the cited violation occurred. The violation has been fully addressed as the subject of the attached Licensee Event Report 90-022, "Violation of Technical Specification due to Exceeding the Allowable Temperature in the Reactor Coolant System with one of the High Head Safety Injection Pumps Inoperable".

As indicated in the attached Licensee Event Report, HL&P is in full compliance and appropriate actions are being taken to prevent recurrence.

In addition, HL&P is in the process of implementing an operational improvement plan to improve personnel performance at STPEGS. The plan consists of interfacing programs, program elements and actions intended to remove barriers inhibiting organizational performance and to improve the tools (hardware, programs, processes and procedures) which have the most effect on performance. This plan will be used by all STPEGS departments in achieving a definitive improvement in performance and plant material conditions. This plan is designed to achieve a steady improvement in performance and will be continued and modified as appropriate to attain this goal.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or myself at (512) 972-8687.


W. H. Kinsey Jr.
Vice President
Nuclear Generation

AKK/amp

Attachment: Licensee Event Report 90-022 (ST-HL-AE-3598)

A1/053.M18

A Subsidiary of Houston Industries Incorporated

IC 446

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311

cc:

Regional Administrator, Region IV
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611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

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U.S. Nuclear Regulatory Commission
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Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 10/08/90

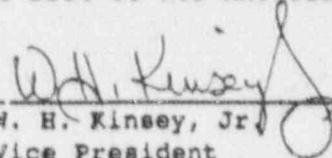
LA/NRC/

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)
)
Houston Lighting & Power) Docket Nos. 50-498
Company, et al.,) 50-499
)
South Texas Project)
Units 1 and 2)

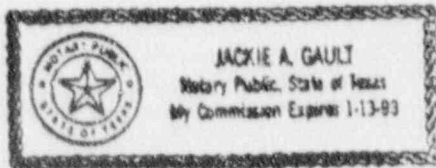
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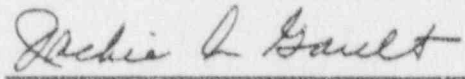
W. H. Kinsey, Jr. being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to NRC Notice of Violation 9031-01 (EA 90-164) "Violation of Technical Specification due to Exceeding the Allowable Temperature in the Reactor Coolant System with One of the High Head Safety Injection Pumps Inoperable"; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.



W. H. Kinsey, Jr.
Vice President
Nuclear Generation

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 30th day of November, 1990.





Notary Public in and for the
State of Texas

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

October 12, 1990

ST-HL-AE-3598

File No.: G26

10CFR50.73

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

South Texas Project Electric Generating Station
Unit 1

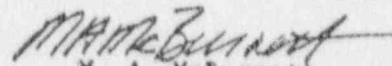
Docket No. STN 50-498

Licensee Event Report 90-022

Violation of Technical Specification due to
Exceeding the Allowable Temperature in the Reactor Coolant
System with One of the High Head Safety Injection Pumps Inoperable

Pursuant to 10CFR50.73, Houston Lighting & Power Company (HL&P) submits the attached Licensee Event Report (LER 90-022) regarding exceeding the allowable temperature in the RCS with one of the HHSI pumps inoperable. This event did not have any adverse impact on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or myself at (512) 972-8530.



M. A. McBurnett
Manager
Nuclear Licensing

AKK/sgs

Attachment: LER 90-022 (South Texas, Unit 1)

~~9010170203~~
LPP

cc:

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Revised 10/08/90

L4/NRC/

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) DOCKET NUMBER (2) PAGE (3)

South Texas, Unit 1

050004981 OF 04

TITLE (4)
Violation of Technical Specification Due to Exceeding the Allowable
Temperature in the RCS with one of the HHSI Pumps Inoperable

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES
09	12	1990	09	022		01	01	1990	

OPERATING MODE (9) 3 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

POWER LEVEL (10) 000	20.402(b)	20.405(e)	30.73(a)(2)(iv)	73.71(b)
	20.405(a)(1)(iv)	30.36(a)(1)	30.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(vi)	30.36(a)(2)	30.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 205A)
	20.405(a)(1)(vii)	X 30.73(a)(2)(ii)	30.73(a)(2)(vii)	
	20.405(a)(1)(viii)	30.73(a)(2)(iii)	30.73(a)(2)(viii)	
	20.405(a)(1)(ix)	30.73(a)(2)(iv)	30.73(a)(2)(ix)	
	20.405(a)(1)(x)	30.73(a)(2)(v)	30.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)
NAME: C. A. Ayala - Supervising Licensing Engineer
TELEPHONE NUMBER: 512 972 8628

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)
YES (If you complete EXPECTED SUBMISSION DATE) NO
EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

ABSTRACT (Limit to 1400 words - 4 spaces between single space typewritten lines) (16)

On September 12, 1990, Unit 1 was in the process of performing a plant heatup. At approximately 0714 hours, Mode 3 was entered. At approximately 0745 hours RCS cold leg temperature exceeded 375 degrees F. The plant heatup continued with the 1B High Head Safety Injection (HHSI) pump out of service. This was a violation of Technical Specification 3.5.2 which requires all HHSI pumps to be operable prior to one or more Reactor Coolant System (RCS) cold leg temperatures exceeding 375 degrees F. At 0800 hours, the condition was discovered. The plant heatup was secured and the 1B HHSI pump was returned to service at 0807 hours. The cause of this event was less than adequate supervisory oversight and communication. Appropriate action was taken with respect to the Unit Supervisor involved. The Reactor Operator involved in this event was counseled in regard to his responsibility to be knowledgeable of applicable procedural requirements. Expectations of management regarding adherence to procedures and attention to detail will be reviewed with the operators. The requirements for control of HHSI pumps during heatup will also be reviewed with the operators.

A1/LEX022U1.L01

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) South Texas, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8 9 0 - 0 2 2 - 0 0 0 2 OF 0 4	LER NUMBER (3)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		

TEXT if more space is required, use additional NRC Form 2664 (1/77)

DESCRIPTION OF EVENT:

On September 12, 1990, Unit 1 was in the process of performing a plant heatup. During the heatup one of the three High Head Safety Injection (HHSI) pumps was not returned to service in accordance with Technical Specification requirements.

While in Mode 4, Technical Specification 4.5.3.1.2 requires that a maximum of one of the three HHSI pumps be operable, that another HHSI pump be operable but with its motor circuit breaker racked out, and that the third HHSI pump have its motor circuit breaker also racked out. Technical Specification 3.5.2 allows entry into Mode 3 with two HHSI pumps inoperable pursuant to Technical Specification Surveillance Requirement 4.5.3.1.2, provided that the pumps are restored to operable status within 4 hours or prior to the temperature of one or more of the RCS cold legs exceeding 375°F, whichever comes first.

At 0710 hours, the Unit Supervisor directed the Reactor Operator (RO) to commence plant heatup. At approximately 0714 hours, Mode 3 was entered and the RO continued the plant heatup from 350 degrees F in the Reactor Coolant System (RCS). At 0735 hours, during the control room crew turnover, the duty Unit Supervisor (the Unit Supervisor who had been on shift) noted that HHSI pump 1B was still out of service. The Unit Supervisor directed an on-coming RO to restore the HHSI pump 1B back to service as soon as possible and continued turnover.

Later discussions revealed that this RO only understood that he should complete an unrelated checklist which he was already performing. The plant heatup continued with the 1B HHSI pump out of service. During the heatup, the RO responsible for control of RCS temperature and pressure did not recall the specific temperature limit (375°F) for operability of all three HHSI pumps nor did he track the progress in implementing procedural steps during heatup.

At approximately 0745 hours RCS cold leg temperature exceeded 375 degrees F. Later in the shift turnover, at 0800 hours, the duty and on-coming Shift Supervisors discovered that RCS temperature was 389 degrees F with the HHSI pump 1B out of service. The plant heatup was immediately secured and the 1B HHSI pump was returned to service at 0807 hours. The NRC was notified of the event at 1316 hours on September 12, 1990.

A1/LER02201.L01

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (3)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	DIVISION NUMBER		
		0 5 0 0 0 4 9 8 9	0 2 2	0 0 0	3	OF 0 4

TEXT if more space is required, use additional NRC Form 366A (11/77)

CAUSE OF EVENT:

1. The cause of this event was less than adequate supervisory oversight and communication. The Unit Supervisor failed to provide the necessary oversight to ensure the plant was in compliance with procedural and Technical Specification requirements. The RO was allowed to proceed with the plant heatup with inadequate direction due to poor communications.
2. Contributing to this event was failure of the RO to track progress in implementing procedural steps during heatup. The 375°F Technical Specification limit for HHSI pump operability is clearly stated in the procedure. The RO also did not recall the specific temperature limit for operability of all three HHSI pumps.

ANALYSIS OF EVENT:

Exceeding 375 degrees F on any RCS cold leg temperature prior to returning all HHSI pumps to service is a violation of Technical Specification 3.5.2. This represents operation prohibited by Technical Specifications which is reportable pursuant to 10CFR 50.73 (a)(2)(1)(B).

HL&P has reviewed the STPEGS safety analyses and determined that the plant remained within its design basis during this event. In this event, there were two operable HHSI trains capable of automatic actuation and the third capable of manual actuation. The plant was subcritical and all three trains of Low Head Safety Injection were operable. Under the plant conditions at the time of the event (425 psi) there is sufficient cooling available in this configuration to provide time for operator action to manually initiate the third train of HHSI should it be necessary. The safety significance of this event is minor as reflected by the Technical Specifications action statement which allows the inoperability of one HHSI train for periods up to 72 hours in Modes 1, 2 and 3.

CORRECTIVE ACTIONS:

1. The Unit Supervisor was temporarily removed from licensed duties and counseled in regard to proper communications and the necessary supervisory oversight expected by management. A disciplinary letter was placed in his personnel file and he was returned to licensed duties subject to increased observation and supervisory oversight.
2. The Reactor Operator was counseled in regard to his responsibilities to be alert to the applicable procedural requirements.

A1/LER022U1.L01

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) South Texas, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8 9 C	LER NUMBER (3)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT IF more space is required, use additional NRC Form 366A-1/117)

CORRECTIVE ACTIONS: (cont'd)

3. A memorandum emphasizing the the expectations of management regarding adherence to procedures and attention to detail will be issued to Reactor Operators and Unit Supervisors by October 15, 1990. These expectations will be reviewed in detail with the Reactor Operators and Unit Supervisors by November 30, 1990.
4. A memorandum emphasizing the requirements for control of MHSI pumps during heatup will be issued to Reactor Operators and Senior Reactor Operators by October 15, 1990. These requirements will be reviewed in detail with the Reactor Operators and Senior Reactor Operators by November 30, 1990.
5. A training module emphasizing the importance of attention to detail and self verification was developed and training was conducted for employees engaged in the maintenance and operation of the plant. This training will be conducted site wide by December 15, 1990.

ADDITIONAL INFORMATION:

LERs 87-012, 88-038, 88-064 and 89-024 for Unit 1 have documented similar events regarding failure to meet Technical Specification requirements prior to mode changes.

A1/LE022U1.L01