

DEC 31 1990

Docket Nos. 50-498
50-499
License Nos. NPF-76
NPF-80

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

Gentlemen:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 50-498/90-34;
50-499/90-34)

This refers to the inspection conducted by Messrs. J. I. Tapia and R. J. Evans of this office conducted October 13 through November 20, 1990. The inspection included a review of activities authorized for your South Texas Project facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection included plant status, onsite followup of events at operating power reactors, followup on corrective actions for violations, onsite followup of written reports of nonroutine events at power reactor facilities, engineered safety features system walkdown, operational safety verification, maintenance observations, complex surveillance, spent fuel pool activities, and refueling activities. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspectors. The inspection findings are documented in the enclosed inspection report.

On the basis of the results of this inspection, certain activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). Although Violation A was identified by your staff, it is being cited because it represents a second recent example of Technical Specification noncompliance, during mode changes, which was caused, in part, by inattention to detail by plant operators. A similar problem was noted in NRC Inspection Report 50-498/90-31; 50-499/90-31.

Violation B cites two examples of failure to follow approved procedures. Although Example 1 was identified by your staff, it is being cited because it represents a continuing declining trend in the area of maintenance and surveillance activities in which procedural noncompliance has resulted in unnecessary challenges to plant safety systems. Example 2 is being cited because it was NRC identified. Although the changes, which were made without the required reviews, to the subject field change request (FCR) were of minimal safety significance, the practice of implementing "corrected original" FCRs without the required level of reviews is potentially more safety significant.

RIV:SR	RI	C:DRP/D	D:DRP
JITapia/lr	RJEvans	ATHowell	SJCollins
12/31/90	12/31/90	12/31/90	12/31/90

IED
1/1

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PDR ADOCK 05000448
Q PDR

We have received your recently implemented Operational Improvement Plan. We understand that this plan is intended, in part, to correct the cause(s) of problems of which Violations A and B are examples. We will monitor the implementation of the Operational Improvement Plan during future inspections in order to assess its implementation effectiveness.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

We have also examined actions you have taken with regard to one previously identified inspection finding. The status of this item is identified in paragraph 4 of the enclosed report.

One unresolved item was identified during this inspection. This item pertained to instances observed by the inspectors that were related to Unit 2 refueling activities. Although these observations have minimal safety significance, they are similar to observations made by NRC in September 1989. Therefore, this item will remain unresolved pending future inspection followup of your corrective actions associated with these observations.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses requested by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

Enclosure:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
50-498/90-34
50-499/90-34

Houston Lighting & Power Company

-3-

cc w/enclosure:
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Houston Lighting & Power Company

-4-

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bcc to DMB (IE01)

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*w/766