

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company  
South Texas Project, Units 1 and 2

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

During an NRC inspection conducted October 13 through November 20, 1990, 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 (1990), the violations are listed below:

- A. TS 3.8.3.2 requires that, in Modes 5 and 6, four 120-volt ac vital distribution panels consisting of DP001, DP1201, DP002, and DP1204 be energized from their associated inverter connected to its respective dc Bus E2A11 and E2C11 (Unit 2).

Contrary to the above, between November 2, 1990, at 10:57 p.m. and November 4, 1990, at 2 p.m., with Unit 2 operating in Mode 6, 120-volt Vital Distribution Panel DP001 was not powered from its associated inverter.

This is a Severity Level IV violation. (Supplement I) (498/9034-02)

- B. Technical Specification (TS) Section 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. Appendix A includes requirements for procedure adherence. Procedure OPGP03-ZA-0010, Revision 11, "Plant Procedure Compliance, Implementation and Review," establishes controls governing procedure compliance. Step 3.1.1 of OPGP03-ZA-0010 states that procedures shall be strictly adhered to when performing plant activities.

Contrary to the above, on October 30 and November 16, 1990, two examples of failure to follow approved procedures were observed: (1) a technician failed to follow safety-related Procedure OPMOP5-N-0001, "General Electric 13.8 Kv Breaker Tests," Step 6.36 in that Step 6.36 was not to be performed for the existing Unit 2 conditions, thereby resulting in an inadvertent ESF actuation signal; and (2) FCR 90-1891 which was issued to change Procedure OPMP05-ZE-0107, "Varmeter Calibration," was changed without the specified reviews required by Procedure OPGP03-ZA-0002, "Plant Procedures."

This is a Severity Level IV violation. (Supplement I) (498;499/9034-03)

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 if applicable, a copy to the NRC resident inspector, 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 the results achieved, (3) the corrective steps which 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 *31<sup>st</sup>* day of *December* 1990