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

January 03, 1991 ST-HL-AE-3655 File No.: G12.442, G2.2 10CFR50.55(e) 10CFR21

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

South Texas Project Electric Generating Station
Units 1 and 2
Docket No. STN 50-498 and 50-499
Change to Commitment
Concerning Class 1E Battery Cables

Reference: Letter ST-HL-AE-2893 dated December 13, 1988, J. H. Goldberg to USNRC

The referenced letter (attached) submitted a report regarding class 1E battery cables supplied by Gould Nuclear Batteries, Incorporated pursuant to 10CFR50.55(e) and 10CFR21. A commitment was made by Houston Lighting & Power (HL&P) as follows:

"...Any further procurements from Gould Nuclear Batteries, Inc. will include requirements for source inspections to ensure that the equipment/accessories are qualified prior to shipment."

Since the time of this commitment, two source inspections have been conducted, neither of which identified any problems that would have affected equipment qualification. Gould Nuclear Batteries, Inc. has discontinued implementation of its Nuclear Quality Assurance Program and has been removed from the HL&P approved vendors list for supply of safety related products. Any equipment or accessories purchased in the future will have to be procured as commercial grade and dedicated for safety related use by HL&P. The commercial grade dedication process identifies and verifies appropriate critical characteristics which provides reasonable assurance that items received are the items specified.

Therefore, in lieu of future source inspections at Gould Nuclear Batteries, Inc., HL&P will comply with the existing procedures for purchasing commercial grade items intended for safety-related applications.

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A Subsidiary of Houston Industries Incorporated

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.Houston Lighting & Power Company
- South Texas Project Electric Generating Station

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

. W. Harrison

Manager,

Nuclear Licensing

CAA/sgs

Attachment

· Houston Lighting & Power Company South Texas Project Electric Generating Station ST-HL-AE-3655 File No.: G12.442, G2.2 Page 3

cc:

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

George Dick, Project Manager U.S. Nuclear Regulatory Commission Washington, DC 20555

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> December 13, 1988 ST-HL-AE-2893 File No.: G12.442, G2.2 10CFR50.55(e)

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

> South Texas Project Electric Generating Station Unit 2 Docket No. STN 50-499 Final Report Concerning Class 1E Battery Cables

Reference (1): Letter ST-HL-AE-2840 dated November 9, 1988, J. H. Goldberg to USNRC

On October 12, 1988 pursuant to 10CFR50.55(e) and 10CFR21, HL&P notified your office of an item concerning Class 1E Battery Cables. The First Interim Report was submitted to the NRC on November 9, 1988 [Reference (1)]. Attached is the Final Report concerning this item.

If you should have any questions on this matter, please contact Mr. M. F. Polishak at (512) 972-7071.

J. H. Coldberg

Group Vice President, Nuclear

KMO/hg

Attachments: Final Report Concerning Class 1E Battery Cables

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A Subsidiary of Houston Industries Incorporated

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> ATTACHMENT / ST-HL-AE-3%55 PAGE 2 OF 4

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Attachment 1 ST-HL-AE-2893 File No.: G12.442, G2.2 Page 1 of 2

> ATTACHMENT I ST-HL-AE-3655 Cab184GE 3 OF

Final Report Concerning Class 1E Batt

I. Summary

During startup testing for Unit 2, it was discovered that jumper cables supplied for the Class 1E batteries differ from the General Electric Gexol cables specified and qualified by Gould, the battery manufacturer. Documentation to support the seismic and environmental qualification of the cables provided is not available. An inspection of Unit 1 cables revealed that the required GE Gexol cables are installed and this deficiency is limited to Unit 2 only. The motion of these cables during a seismin event could impose stress on the battery terminals which could result in a loss of function of the batteries. This would result in the loss of DC control power to the Class 1E Standby Diesel Generators and 4160 volt ESF circuit breakers. The loss of control power would result in the inability to start the Standby Diesel Generators, and a loss of the Class 1E onsite power supplies. It was concluded that this deficiency could result in a substantial safety hazard if left uncorrected and therefore, was determined to be reportable pursuant to 10CFR50.55(e) and 10CFR21.

II. Description of the Deficiency

The jumper cables supplied for the Class 1E batteries by Gould Nuclear Batteries, Incorporated, Industrial Battery Division differ from the General Electric Gexol cables required per the approved vendor drawing. Use of these unqualified cables represents a potential failure mode for the Class 1E batteries during a seismic event. These jumper cables are used to connect the battery cells in series, and their motion may impose stresses on the battery terminals which could cause their failure and a consequent loss of function of the batteries. During Unit 2 startup testing activities, it was discovered that some jumper cables had no manufacturing markings and some had markings other than the approved GE Gexol cables. Discussion with Gould confirmed that the only cables currently qualified for the Class 1E batteries are the GE Gexol cables.

An inspection of Unit 1 and 2 Class 1E batteries decermined that the 20 cables installed in Unit 1 were the qualified 3E Gexol cables. Documentation to support the seismic and environmental qualification of 20 cables provided for Unit 2 is not available. Therefore, they are not considered to be properly qualified.

III. Corrective Action

HL&P has completed qualification of other jumper cables for use in Unit 2. The unqualified cables have be replaced with these qualified cables.

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IV. Recurrence Control

Investigation of this deficiency determined that the jumper cables provided for use at STP were certified by Gould to meet project specifications. However, the jumper cables were not manufactured with GE Gexol cable in accordance with approved design requirements, and documentation to support the seismic and environmental qualification of the cables was not available. This deficiency was a result of inadequacies in the vendor's procedures used to ensure the selection of correct qualified cables. Any future procurements from Grald Nuclear Batteries, Inc. will include requirements for source inspections to ensure that the equipment/accessories are qualified clior to shipment.

V. Safety Analysis

The failure of these cables following a seismic event would result in a loss of function of the batteries causing the unavailability of the Class IE Standby Diesel Generators and the loss of DC control power to the Class IE 4160 volt ESF circuit breakers. This would result in a loss of the Class IE onsite power supplies. HL&P has concluded that this deficiency could result in a substantial safety hazard if left uncorrected. Therefore, this item was determined to be reportable pursuant to 10CFR50.55(e) and 10CFR21.