

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

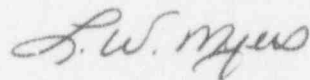
May 24, 1994  
ST-HL-AE-4798  
File No.: G02.04  
10CFR2.201

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

South Texas Project  
Unit 1  
Docket No. STN 50-498  
Reply to Notice of Violation 94009-01  
Regarding Separation Between Scaffolding and Equipment

Houston Lighting & Power Company has reviewed Notice of Violation 9409-01, dated April 25, 1994, regarding separation between scaffolding and equipment and submits the attached reply.

If you have any questions, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7239.



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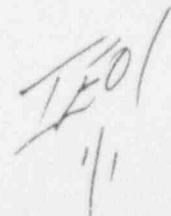
Attachment: Reply to Notice of Violation 498/94009-01

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A Subsidiary of Houston Industries Incorporated

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Reply to Notice of Violation 498/94009-01

I. Statement of Violation

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.

II. Houston Lighting & Power Position

Houston Lighting & Power concurs that the violation occurred.

III. Reason For Violation

Procedure OPGP03-ZM-0028 was originally written to ensure separation was established for commodities that were susceptible to damage from scaffolding components. Large bore piping was not considered susceptible to damage and was not specifically included in the procedure.

Drawing 3A01-0-S-10003, Item C, provides minimum construction separation requirements for eleven groups of permanent plant commodities. When OPGP03-ZM-0028 was written, the intent was to reference the applicable separation requirements on the drawing rather than calculate new separation requirements.

Although the minimum separation criteria were available on drawing 3A01-0-S-10003 for permanent plant commodities, procedure OPGP03-ZM-0028 did not specifically direct the scaffold constructors to use those criteria for the construction of scaffolding near permanent plant commodities.

#### IV. Corrective Actions

The following corrective actions have been taken:

1. The scaffold cross member touching the Essential Cooling Water Pump 1A discharge piping was adjusted to provide the minimum construction separation specified in drawing 3A01-0-S-10003 and to improve access to valves.
2. The scaffolding contractor is performing inspections of scaffolding installed in Unit 1 and Unit 2, a total of approximately 200. The inspection guidelines include verification that separation requirements for plant commodities are met and that operability and accessibility of safety-related equipment, valves, switchgear, switches, motor control centers and cabinets are not adversely impacted. Adjustments to scaffolding are being made as needed during the inspections. The inspections have been completed in areas in which safety-related equipment is located.
3. The scaffolding contractor has conducted awareness training with scaffold personnel to increase personal sensitivity to separation requirements as well as equipment accessibility and operability requirements.
4. Nuclear Training Department Lesson Plan MSS308, Rev. 2 "Scaffold Erection/Inspection" has been reviewed for adequacy. The Lesson Plan adequately trains scaffold constructors how to determine the separation criteria between scaffolding components and plant commodities.
5. Procedure OPGP03-ZM-0028 has been revised to provide guidance on how to determine separation requirements between scaffolding components and permanent plant commodities.

#### V. Date of Full Compliance

Houston Lighting & Power is in full compliance.

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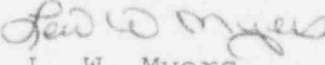
May 25, 1994  
ST-HL-AE-4792  
File No.: G02.04  
10CFR2.201

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

South Texas Project  
Unit 1  
Docket No. STN 50-498  
Reply to Notice of Violation 94009-02  
Regarding a Change to a Surveillance Test Procedure

Houston Lighting & Power Company has reviewed Notice of Violation 94009-02, dated April 25, 1994, regarding a change to a surveillance test procedure and submits the attached reply.

If you have any questions, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7239.

  
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Attachment: Reply to Notice of Violation 498/94009-02

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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Reply to Notice of Violation 498/94009-02

I. Statement of Violation:

Solid State Protection System Actuation Train B Slave Relay Test

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).

II. Houston Lighting & Power Position:

Houston Lighting & Power concurs that the violation occurred.

III. Reason for Violation:

The intent of procedure OPSP03-SP-0009B was inadvertently changed because the technical review was incorrect. In addition, the control room crew did not independently confirm that the procedure steps to be performed were correct because the shift Night Orders contained specific procedural direction concerning performance of the surveillance test.

Surveillance testing was scheduled for the automatic switchover to containment sump actuation logic, which is contained in procedure OPSP03-SP-0009B. Because the procedure tests several functions, only specific steps of the procedure are required to test an individual function, and a process is required for determining the steps that must be performed. Procedure OPGP03-ZA-0010, "Performing and Verifying Station Activities", provides this process by specifying that the Shift/Unit Supervisor can authorize performance or omission of specific procedure steps based on plant operating conditions.

In accordance with procedure OPGP03-ZA-0010, a technical review of OPSP03-SP-0009B was performed to determine which steps were required to test the desired logic circuit. However, the technical review did not identify all of the steps necessary to satisfactorily perform the surveillance test. The results of this technical review were reflected in the shift Night Orders in the form of specific procedural direction for performing the surveillance. The control room crew assumed that the evolution had been adequately evaluated and did not independently confirm that the correct steps of procedure OPSP03-SP-0009B were being performed. When the surveillance test was performed using the directions in the shift Night Orders, the desired test result was not achieved.

IV. Corrective Actions:

The following corrective actions have been taken:

1. The surveillance test was performed using the correct steps with satisfactory results.
2. A shift briefing item on the lessons learned from this event was distributed to the Shift Supervisors to discuss with their crews. The item described the failure to adequately evaluate the effects of the steps being made "not applicable" and reminded the Shift/Unit Supervisors of their responsibilities/authority in this area.
3. This event and the requirements of OPGP03-ZO-0040, "Maintenance of the Operations Policies and Practices Manual" were discussed with personnel responsible for approving Night Orders to ensure proper use of and the responsibility for ensuring accurate information is contained in the Night Orders.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance