

APPENDIX A

NOTICE OF VIOLATION

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

Dockets: 50-498
50-499

Licenses: NPF-76
NPF-80

During an NRC inspection conducted March 13 through April 23, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

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. Item 8 states, in part, that specific procedures for surveillance tests should be prepared.

1. Plant Surveillance Procedure 2PSP03-CH-0005, Revision 4, "Essential Chilled Water Pump 21B Reference Values Measurement," Step 2.11 states, in part, that the procedure shall be performed in the sequence written.

Contrary to the above, on April 13, 1994, the steps of the procedure were not performed in the sequence written, in that the inspector observed a reactor plant operator perform Steps 5.18 through 5.25 of Plant Surveillance Procedure 2PSP03-CH-0005 prior to performing Step 5.17.

2. Plant Surveillance Procedure 0PSP02-SI-0963, Revision 0, "Accumulator B Pressure Group 2 ACOT (P-0963)," Step 4.1 states, in part, that whichever unit data package is not applicable to the test to be performed shall be removed and discarded.

Contrary to the above, on April 5, 1994, the Unit 2 data package was not applicable and was not removed and discarded prior to the performance of the test. This resulted in the performance of all prerequisites, precaution, and pretest verifications for the Unit 1 Accumulator B test being documented on the Unit 2 data sheet. Had the test been continued utilizing the wrong data sheet, the results would have been erroneous.

3. Plant Operating Procedure 0POP01-ZQ-0022, Revision 4, "Plant Operations Shift Routine," Step 6.4.2.6 states, in part, that commencing or completing any procedure used to satisfy Technical

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Specification surveillance requirements which require the shift supervisor's permission to perform shall require entry in the control room logbook.

Contrary to the above, on April 3, 1994, Plant Surveillance Procedure OPSP03-RC-0006, Revision 2, "Reactor Coolant System Surveillance Test," a procedure used to satisfy Technical Specification surveillance requirements, and which required the shift supervisor's permission to perform, was commenced and completed without an appropriate reference in the control room logbook.

4. Plant Operating Procedure OPOP01-ZQ-0022, Revision 4, "Plant Operations Shift Routine," Step 6.4.2.4, states that entry or exit from applicable Technical Specification action statements shall be required entries in the control room logbook.

Contrary to the above, on April 4, 1994, the required entry into Technical Specification Action Statement 3.4.6.26 was not documented in the control room logbook following the failure of a reactor coolant system water inventory balance test.

5. Plant Surveillance Procedure IPSP03-RH-0007, Revision 5, "Residual Heat Removal System Valve Operability Test (cold Shutdown)," Step 2.2, states, in part, that the performer shall obtain a calibrated stopwatch, with an appropriate accuracy.

Contrary to the above, on March 16, 1994, a licensed operator failed to obtain a calibrated stopwatch prior to the performance of Procedure IPSP03-RH-0007, in that he utilized a stopwatch, Identification Number 100-00711 006, that had an expired calibration.

This is a Severity Level IV problem (Supplement I)(498/94010-01).

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 a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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 results achieved, (3) the corrective steps that 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 *21st* day of *July* 1994