

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project

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

During an NRC inspection conducted on August 6-15, 1991, 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 (1991), the violations are listed below:

Condition 2 of the facility operating license requires Houston Lighting & Power Company to fully implement and maintain in effect all provisions of the Physical Security, Guard Training and Qualifications, and Safeguards Contingency Plans previously approved by the Commission and all amendments and revisions to such Plans made pursuant to the authority granted under 10 CFR 50.90 and 10 CFR 50.54(p).

- A. 10 CFR 50.54 states, "The licensee may make no change which would decrease the effectiveness of a security plan....or contingency plan....without prior approval of the Commission."

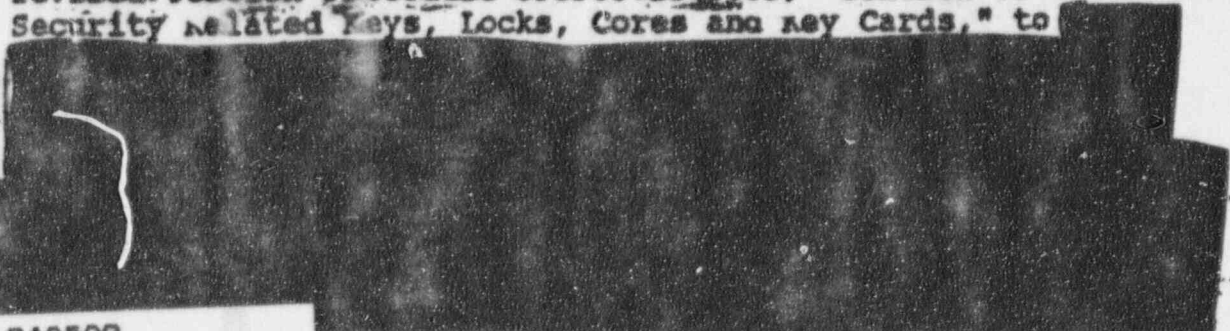


73.21(b)(1)(iv)

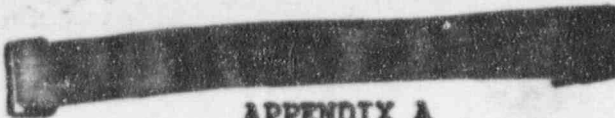
73.21(b)(1)(ix)

Contrary to the above, without prior Commission approval, on October 17, 1988, the licensee decreased the effectiveness of both the Security and Contingency Plans in that it revised Station Procedure OPGP03-SS-0005, "Control of Security related Keys, Locks, Cores and Key Cards," to

73.21(b)(1)(ix)



73.21
(e)



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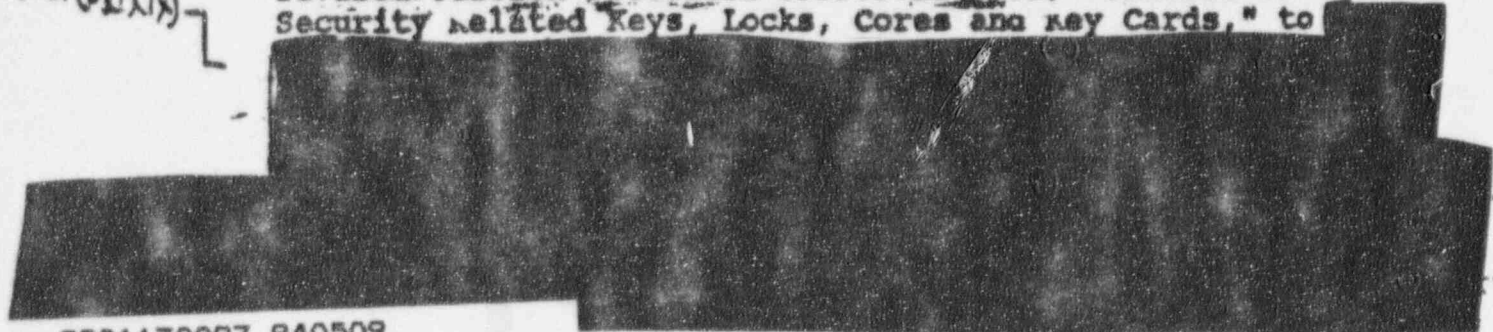


73.21(b)(1)(v)

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73.21(b)(1)(ix)



73.21
(e)

73.21(e)

This is a Severity Level IV violation (Supplement III).

73.21(b)(i)^B

[redacted] "Perimeter intrusion detection alarm systems shall be tested against design specifications... after each inoperative state. Vital area intrusion detection systems shall be tested against design specifications...after each inoperative state...."

73.21(b)(i)

[redacted] defines Functional (Performance) Tests as, "a test of the alarm systems after each inoperative state (an inoperative state exists when both primary and backup power sources fail to provide power)."

Contrary to the above, on March 9, 15 and 21, 1991, the Unit 2 perimeter and vital areas alarms were inoperative, due to loss of both primary and backup power sources, and no functional tests were performed prior to the relief of the compensatory measures at the time of power restoration.

This is a Severity Level IV violation (Supplement III).

73.21(b)(i) C.

[redacted] describes the uninterruptable power source for the security system and states, in part "Failure of the plant power source results in the starting and loading of the security dedicated diesel generator."

Contrary to the above, on August 8, 1991, the security diesel generator failed to start upon loss of its plant power [redacted]

73.21(b)(i)

This is a Severity Level IV violation (Supplement III).

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, 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 that have been taken and the 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

[redacted]

73.21(e)

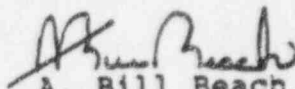
Notice of Violation

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taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

U. S. NUCLEAR REGULATORY COMMISSION



A. Bill Beach, Director
Division of Reactor Projects

Dated at Arlington, Texas
this 5th day of November 1991



73.21 (c)