HOUSTON LIGHTING AND POWER COMPANY
SOUTH TEXAS PROJECT
ELECTRIC GENERATING STATION
PLANT PROCEDURES MANUAL

DEPARTMENT PROCEDURE

NON SAFETY-RELATED (Q)

Plant Operations Department
Administrative Guidelines

APPROVED: _____ 5/18/94 05/24/94
Unit Operation Manager Date Approved Date Effective

Usage Control: IN HAND (See Table of Contents for exceptions)

6 PP

Usage	Table of Contents			Page
3		5.4	Locked Component Program Guidelines	10
3		5.5	Independent Verification Guidelines	10
3		5.6	Dual Verification Guidelines	14
3		5.7	Locking Guidelines	15
3		5.8	Locked Component Key Control	16
3		5.9	Locked Component Deviations	16
4	6.0	References		18
4	7.0	Support Documents		20
3		7.1	Addendum 1, Plant Systems Requiring Independent Verification	21
3		7.2	Addendum 2, POD Standard for Determining Valve Position	23
2		7.3	Addendum 3, Locked Component Deviation Log (Typical)	24
1		7.4	Emergency Operations Equipment Inventory Checklist (-1)	25

Usage

1 - IN HAND
2 - IN HAND CONTROLLING STATION
3 - REFERENCED
4 - AVAILABLE

1.0 PURPOSE

The purpose of this procedure is to establish a central location for the following inventories and programs that are specific to Plant Operations Department conduct of business:

- o System Lineup User's Guide
- o Owner Communication Plan
- o Emergency Operations Equipment Control
- o Locked Component Control

2.0 SYSTEM LINEUP USER'S GUIDE (Ref 6.15)

2.1 System Lineups serve as a baseline configuration upon which further operations are based. System Lineups SHALL be performed as described below:

2.1.1 Locked In Place components aligned in the System Lineups are initial settings and MAY be adjusted as required to maintain proper flow rates.

2.1.2 ALIGN all components as indicated on the checklist and initial the appropriate block. The position of all components SHALL be verified using the visual inspection techniques or remote indications specified in Section 5.0, Locked Component Program, of this procedure (Ref 6.16 and 6.20). The lineup performer SHALL ensure that pipe caps are properly installed while performing the lineup (Ref. 6.21).

2.1.3 IF any component/label discrepancies are discovered, THEN NOTE the discrepancy on the checklist to allow resolution.

2.1.4 WHEN all checklist items have been completed, THEN the operator who completed the checklist SHALL sign and date the checklist AND present the checklist to his/her supervisor.

2.1.5 IF Supervisory personnel direct an Independent Verification to be performed for those components requiring Independent Verification THEN initial the appropriate block on the checklist.

2.1.6 WHEN the Independent Verification is completed, THEN the operator who performed the Independent Verification SHALL sign and date the checklist and present the checklist to his/her supervisor.

2.1.7 The completed checklist SHALL be reviewed by the Unit/Shift Supervisor or Chemical Operations Supervisor, as appropriate, to verify the Lineup is complete and to note any exceptions or unusual conditions.

2.1.8 The responsible supervisor SHALL address exceptions on a case by case basis to ensure compliance with Technical Specifications and reliable system/component operation.

2.1.9 Copies of the completed checklist SHALL be inserted in the Control Room system status file or the watchstation system status file, as appropriate.

2.1.10 The superseded checklist SHALL be forwarded for record retention or discarded as appropriate.

2.2 Exceptions noted on a System Lineup SHALL be tracked using the Configuration Management System to ensure compliance with Technical Specifications and reliable system/component operation.

2.3 IF the performance of the alignment will result in a significant radiation exposure, serious personnel safety hazard or if the associated components are located in the Auxiliary Feedwater Storage Tank Valve Pit, THEN Independent Verification may be waived by the Shift Supervisor.

2.4 Valves located in the AFWST valve pit are not required to be checked unless the security barrier is breached. IF the AFWST valve pit security barrier is breached, THEN valves in the AFWST valve pit SHALL be verified and Independently Verified according to the system lineup just prior to final closure of the security barrier.

3.0 OWNER COMMUNICATION PLAN

3.1 PURPOSE

The Plan describes the communication methodology for providing information to the owners of South Texas Project.

3.2 DEFINITIONS

3.2.1 IMMEDIATE NOTIFICATIONS - A notification that provides information to owner top management regarding significant events at the STP that involve a major impact on the Station's operation, cost, or have potential for media coverage. Examples include:

- o Major personnel injury or fatality
- o Regulatory violation that could result in a civil penalty
- o Major equipment failure
- o Event requiring plant shutdown
- o Event activating the emergency plan
- o Event leading to load reduction

3.2.2 OPERATIONS REPORTS - Reports that advise each owner of the expected net effective generating capability, operational constraints and the schedule for delivery of power and energy from STP. This information is provided utilizing routine daily reports (obtained by OPOP01-ZQ-0022, Plant Operations Shift Routines) in addition to real-time communications between HL&P and Co-owner System Controllers and STP Operations personnel.

3.2.3 DUTY PLANT MANAGER - The individual responsible for overall plant operation and initiating Immediate Reports as identified in this plan. The Plant Manager will normally perform this function. During weekends, holidays, etc., the Duty Plant Manager will be the designated individual. The rotational list of the Duty Plant Manager is maintained on the Prime Computer under the call-out list and in the Control Rooms. Requests for information from Co-owners during weekends and outside normal working hours should be directed to the Duty Plant Manager.

3.3 IMMEDIATE NOTIFICATIONS

Any problem reports which meet the criteria for severity level 1 per 0PGP03-ZX-0002, Corrective Action Program, will initiate action per this section of the communication plan. The Duty Plant Manager will further screen these reports to determine if immediate Co-owner reports are required.

3.3.1 WHEN an event occurs which meets the criteria for a severity level 1 problem report, THEN the Shift Supervisor SHALL ensure the appropriate immediate notifications listed below are made:

3.3.1.1 NRC (if required) - the NRC will be notified if the activity or event meets the guidelines established in the Reporting Manual.

3.3.1.2 Appropriate Plant Support Departments (as required) - the appropriate personnel will be contacted to provide necessary support to resolve the problems.

3.3.1.3 HL&P Energy Control Department (ECD) - will be notified immediately of any event or activity which can affect a unit's power production capabilities including:

- o Unit trips or automatic runbacks, including the reason for the trip or runback and the estimated recovery time;
- o Events requiring unit load reduction or shutdown, including the reason, amount, estimated duration, and estimated load change rate;
- o Events resulting in activation of the station emergency plan, including the classification, reason and time the emergency was declared, and its effect on plant power production.

3.3.1.4 Duty Plant Manager - will be expeditiously notified of any activity or event which could result in a severity level 1 problem report.

3.4 OPERATIONS REPORTS

3.4.1 STP Operations to HL&P Energy Control Center

In addition to providing information concerning unit trips, load reductions, and activation of the emergency plan as described above, the Shift Supervisor SHALL ensure the HL&P system controller is notified of any unusual or abnormal limitations on operations which currently exist or are expected to exist during the forecast period and which may inhibit ability to change generator output or respond to changing conditions on the Co-owners' systems.

3.4.2 HL&P ECD to STP Operations

3.4.2.1 Requests for unit power output changes required to meet scheduled allocation requirements or respond to transmission system emergencies.

3.4.2.2 Provide unit reactive load requirements.

3.4.2.3 Provide switching orders.

4.0 EMERGENCY OPERATIONS EQUIPMENT CONTROL

4.1 Emergency Operations lockers have been set aside to ensure tools required during emergencies are readily available.

4.2 The Emergency Operations Equipment lockers are inventoried quarterly by POD personnel as follows:

4.2.1 INVENTORY each locker on both units in accordance with the Emergency Operations Equipment Inventory Checklist (-1).

4.2.2 DOCUMENT any discrepancies found during the performance of the Emergency Operations Equipment Inventory PM.

4.2.3 CORRECT all discrepancies identified and RECORD the resolution on the Emergency Operations Equipment Inventory PM.

5.0 LOCKED COMPONENT PROGRAM (Ref. 6.2, 6.6, 6.8, 6.13, & 6.14)

5.1 PURPOSE

The Locked Component Program ensures that components required by Technical Specifications, system design, or good engineering practice are administratively locked and checked periodically to ensure conformance to the established locked position.

5.1.1 A component locked in accordance with this program:

5.1.1.1 Provides some assurance the component is operated by plant personnel with the appropriate permission to operate the component.

5.1.1.2 Reminds plant personnel of the importance of the component.

5.1.2 A component locked in accordance with this program does NOT:

5.1.2.1 Prevent a component from being misoperated as a direct result of sabotage.

5.1.2.2 Totally restrict valve motion when appropriately locked (i.e. handwheel may move with valve locked).

5.2 SCOPE

The program does not contain every valve shown as locked on a P&ID. The valves in the program were selected based on the following criteria:

5.2.1 Components required to ensure operability, ensure containment integrity, and support specific STPEGS safety analysis (e.g., Boron Dilution Analysis).

5.2.2 Components locked on systems requiring Independent Verification as listed in Addendum 1, Plant Systems Requiring Independent Verification.

5.2.3 Components selected by the Plant Operations or Chemical Operations and Analysis Department that are locked as a good operating practice.

5.3 DEFINITIONS

5.3.1 LO: Locked Open

5.3.2 LC: Locked Closed

5.3.3 LIN: Locked In Neutral

5.3.4 LIP: Locked In Place

5.3.5 LOCK: The mechanism used to provide at least a limited physical restraint on the operation of a component. This may include padlocks or other types of sealing devices.

5.3.6 OPERATIONAL AUTHORITY: The Supervisor in direct control over the operation of a component or system. The Operational Authority for the following are:

- o Plant Operations Department is the Unit/Shift Supervisor.
- o Chemical Operations is the Chemical Operations Supervisor.
- o Facilities Management is the Manager Facilities Management.
- o Chemical Analysis is the Chemical Technican Supervisor.

5.3.7 INDEPENDENT VERIFICATION: The act of checking a condition, such as a component position, separately from activities related to establishing the condition or component's position. Independent Verification shall apply to valves, breakers, switches, jumpers, lifted wires, blind flanges, plugs, electrical equipment links, control cards, field instruments and transmitters, or any other component that could, if improperly installed or mispositioned, degrade a safety function.

5.3.8 DIRECT INDEPENDENT VERIFICATION: Independent Verification by means of physical or visual indication of the component locally.

5.3.9 INDIRECT INDEPENDENT VERIFICATION: Independent Verification performed by observing known reliable [illegible] itive - indicating instruments, annunciators, and valve position indicators.

5.3.10 DUAL VERIFICATION: The act, by a second individual in conjunction with the performer, of checking the performance of an activity, prior to or concurrent with the activity, to ensure that the correct activity is being performed on the correct component.

5.4 LOCKED COMPONENT PROGRAM GUIDELINES

5.4.1 Locked components are periodically verified to be in the correct position and appropriately locked by either:

5.4.1.1 A Surveillance Test, or

5.4.1.2 A System lineup required to be performed on a periodic basis.

5.4.2 Documentation of locked component deviations SHALL be performed and tracked using either an approved procedure with the appropriate verifications OR by tracking the deviation on the Locked Component Deviation Log. (Refer to Addendum 3)

5.4.3 Locked components on systems requiring Independent Verification SHALL be verified in accordance with the Independent Verification methods described in Section 5.5, Independent Verification Guidelines.

5.4.4 Locked valve positions SHALL be verified as described in Addendum 2, POD Standard For Determining Valve Positions.

5.5 INDEPENDENT VERIFICATION GUIDELINES

5.5.1 Independent Verification Policy

5.5.1.1 Independent Verification should be performed as soon as practical after the associated task is performed.

5.5.1.2 The act of performing the Independent Verification SHALL be separate from and independent of the initial alignment, installation, or verification. The Independent Verifier SHALL NOT observe the actions of the individual performing the initial alignment or verification. Verifier independence SHALL be maintained to ensure the integrity of the Independent Verification. The Independent Verifier SHALL not base his verification on observation of the actions or reports of a performer or initial verifier.

5.5.1.3 In cases where special conditions must be established to allow Independent Verification (e.g. opening security barriers, special entry inside the Reactor Containment Building), the verifier and Independent Verifier MAY coordinate their verifications. The Independent Verifier SHALL take measures to ensure his verification is independent and not based on actions or observations of the verifier.

5.5.1.4 IF alignment changes or alteration of status does NOT render the components/systems incapable of performing the designated safety function, THEN Independent Verification is not required.

5.5.1.5 Independent Verification as described herein SHALL be implemented except in cases which involve significant radiation exposure, a reduction in personnel safety, or during emergency conditions. In such cases, Indirect Independent Verification should be used.

5.5.1.6 Indirect Independent Verification or functional testing SHALL ONLY be used when the indication is positive and immediate.

5.5.1.7 Alignment changes or alterations in status of components/systems identified in Addendum 1 SHALL be Independently Verified when:

a) A component/system is returned to service following a period when the component/system was inoperable for maintenance or testing.

b) Component/system which provide safety functions are required to be operable.

c) A component/system alignment is altered during the performance of a surveillance test, special test, or engineering test.

5.5.1.8 Provisions for documenting Independent Verification SHALL be:

a) Provided in applicable procedures

b) Include, as minimum, space for the initials or signature of the individuals performing the alignment and verification.

c) Incorporate these requirements by Field Change in cases where these provisions are not made.

5.5.2 Independent Verification Methods

5.5.2.1 Direct Independent Verification is the preferred method and may be completed by one of the following methods: (Other acceptable means exist and may be employed to complete the Independent Verification.)

a) Manual valves to be Independently Verified LOCKED OPEN should be moved slightly in the closed direction and then moved in the open direction until the valve is considered in the fully open position.

1) Visual observation of the stem, (i.e., grease markings indicating normal valve travel, valve stem extended on rising stem valves) and mechanical position indication should also be performed.

2) Valves required to be positioned slightly off backseat to prevent binding should be fully opened and returned to the procedurally established position during Independent Verification.

b) Manual valves to be Independently Verified LOCKED CLOSED should be moved, or attempted to be moved, only in the closed direction using normal closing torque.

1) Visual observation of the stem (i.e., grease markings indicating normal valve travel, valve stem inserted on rising stem valves) and mechanical position indication should also be performed.

c) Visual observation and comparison with the requirement of stem position, local indicators, or other suitable valve component should be used to independently verify the position of throttled valve position.

d) Throttled valves SHALL NOT be moved to verify position unless specifically authorized by the Unit/Shift Supervisor or Chemical Operations Supervisor.

e) Control valve position should be Independently Verified by ensuring that power or air, as appropriate, is available to the valve operator and that no physical obstructions which could prevent proper operation are apparent.

f) Indicating lights may be used for Independent Verification of valve and breaker positions when required for manipulation of a system configuration, however; local verification of position SHALL be performed when restoring a component to service after maintenance which could have affected the indicating lights.

g) Methods of performing direct observation for Independent Verification of breakers include, but are not limited to:

1) Visual observation of local breaker position indicating mechanical flags.

2) Visual observation of breaker switch or handle position.

5.5.2.2 Indirect Independent Verification MAY be utilized when significant radiation exposure or a reduction in personnel safety prevents direct Independent Verification as determined by the Supervisor. Any of the following methods may be utilized. (Alternate methods are also available and may be utilized at the discretion of the Supervisor.)

a) Visual observation of remote indicating lights for breaker operation.

b) Visual observation of an actuation indication for verification of a setpoint.

c) Visual observation of flow indicators as applicable to opening and closing valves, and/or remote valve position indicating lights (valve positions).

d) Functional testing ONLY if plant safety is NOT compromised AND the indications are positive and immediate.

5.6 DUAL VERIFICATION GUIDELINES

5.6.1 Dual Verification Policy

5.6.1.1 Dual Verification is only required to be performed when directed by a procedure step.

5.6.1.2 Dual Verification is intended to be used when Self Verification does not provide an adequate barrier to prevent adverse consequences including risk of Reactor Protection System or Engineered Safety Features actuation, significant equipment damage, or personnel injury.

5.6.2 Dual Verification Method

5.6.2.1 Prior to step performance, the performer and verifier SHALL independently read or have read the step to be performed. The performer and the verifier SHALL agree that the step is understood.

5.6.2.2 The performer SHALL perform the four step Self Verification process (STAR). At the "Think" Step, the verifier SHALL verbally concur that the correct component has been touched.

5.6.2.3 Before the "Act" step the performer SHALL verbally state his intention. The verifier SHALL verbally state his concurrence.

5.6.2.4 Upon completion of the step the performer and verifier SHOULD document the performance/verification as specified in the controlling procedure. The documentation MAY be delayed if the record copy is at a remote location or if ALARA or work practice concerns make it undesirable to immediately document completion.

5.7 LOCKING GUIDELINES

5.7.1 Valves may be locked to the pipe to which the valve is attached or the hanger/support providing restraint for the valve.

5.7.2 Valves may be locked to another valve on similar size piping (e.g., do NOT lock a valve on an eight inch line to a valve on an instrument line). This locking practice prevents valves on larger lines from damaging valves on small lines during seismic or vibrational events.

5.7.3 Valves may be locked to piping, conduit, or tubing lines that are similar in size to the line to which the valve is attached (e.g., do NOT lock a valve on an eight inch line to instrument tubing). This locking practice prevents valves on larger lines from damaging small lines during seismic or vibrational events.

5.7.4 WHEN locking a valve to another valve, pipe, conduit, or tubing line, THEN the locking cable should have sufficient slack to allow for thermal expansion. This will prevent excessive stress on the locked valve and the components locked to the valve.

5.7.5 SECURE locked components using either:

5.7.5.1 Locking cables with key operated padlocks;

5.7.5.2 Locking cables with seal tabs;

5.7.5.3 Built-in features with key operated padlocks; or

5.7.5.4 Built-in features with seal tabs.

5.7.6 DELETED

FZ94-1062

5.8 LOCKED COMPONENT KEY CONTROL (Ref. 6.10)

5.8.1 Keys to Operations key operated locks are controlled by the Unit/Shift Supervisor per the requirements of 0POP01-ZA-0019, Locked Component Key Control.

5.8.2 Separate locksets SHALL be used by Unit One and Unit Two to provide positive locking control between units.

5.8.3 Common unit components should be locked with the Unit One lockset.

5.9 LOCKED COMPONENT DEVIATIONS

5.9.1 General Guidelines

NOTE

A Locked Component Deviation occurs ANYTIME a Locked Component is unlocked.

5.9.1.1 Locked component deviations SHALL be performed and tracked using either an approved procedure with the approprate verifications OR by tracking the deviation on the Locked Component Deviation Log.

5.9.1.2 Locked components SHALL NOT be repositioned without permission from the cognizant Operational Authority or in accordance with an approved procedure.

5.9.2 Locked Component Deviation Log

5.9.2.1 The Locked Component Deviation Log SHALL be maintained in the applicable unit's Control Room.

5.9.2.2 The Unit/Shift Supervisor or the Chemical Operations Supervisor, as applicable, is responsible for ensuring an entry is made into the Locked Component Deviation Log PRIOR to performance of a Locked Component Deviation. This entry is not required for Locked Component Deviations performed in an approved procedure with the appropriate verifications.

5.9.3 Initiating a Locked Component Deviation Log Entry

5.9.3.1 The Unit/Shift Supervisor or the Chemical Operations Supervisor, as applicable, completes the following on the Locked Component Deviation Log:
(Refer to Addendum 3)

a) COMPONENT NUMBER - RECORD the device number for the component being repositioned.

b) REQUIRED POSITION - RECORD the normal locked position of the component.

c) REASON - RECORD a brief description of the reason for the changing component position.

d) NEW POSITION - RECORD the deviation position (i.e. LO, LC, Closed, etc.) of the locked component.

5.9.3.2 IF the Unit/Shift Supervisor is satisfied with the request, THEN the Unit/Shift Supervisor INITIALS AND RECORDS the date/time on the Locked Component Deviation Log.

5.9.3.3 The Operational Authority ASSIGNS an Operator to reposition the locked component.

5.9.3.4 The Operator SHALL inform the Unit/Shift Supervisor or Chemical Operations Supervisor, as applicable, PRIOR to unlocking the component.

5.9.3.5 The Operator positioning the component, INITIALS in the POSITIONED BY block of the Locked Component Deviation Log. The Operational Authority may INITIAL the POSITIONED BY block for the operator per telephone or radio communications.

5.9.4 Closing a Locked Component Deviation Log Entry

5.9.4.1 The Operational Authority ASSIGNS an Operator to return the locked component to its required position.

5.9.4.2 The Operator positioning the component, INITIALS in the RESTORED TO REQUIRED POSITION BY block AND RECORDS the date/time.

5.9.4.3 The Operational Authority ASSIGNS another Operator to Independantly Verify the position of the component AND the adequacy of the locking mechanism.

5.9.4.4 WHEN satisfied with the position AND locking mechanism, THEN verifying Operator INITIALS in the IV'D BY block of the Locked Component Deviation Log.

6.0 REFERENCES

6.1 SER 87-0004, Failure of Air Operated Valves to Operate, MATS# 8500549-936.

6.2 OMR 86-298, Unmonitored Release From Boric Acid Hold Tanks, MATS# 8600694-936.

6.3 UFSAR 6.3.55, Valve Position Indication, 8601304-936.

6.4 ST-HL-AE-2107, Power Lockout of RHR and CCW Valves, LCTS# 8700524-936.

6.5 ST-HL-AE-2141, High Radiation Containment Isolation Signal for Supplementary Purge, LCTS# 8700550-936.

6.6 SPR 900375/LER 1-90-006, AFW Recirculation Valve Found Open Following A Reactor Trip, LCTS# 9000955-936.

6.7 INPO 85-017, Guidelines for Conduct of Operations at Nuclear Power Stations.

6.8 UFSAR Q211.29, Administrative Control of Valves, LCTS# 8601304-860

6.9 PORC Meeting 87-001, Unit Specific Designations, LCTS# 8700015-866

6.10 IEN 84-058, Inadvertent Defeat of Safety Functions Caused By Human Error, MATS# 8500067-866

6.11 ST-HL-AE-1765, Boron Dilution Analysis, LCTS# 8801608-936

6.12 SPR 900210, Seal Broken on Valves 1-FC-0012B, -0016A, & -0016B, MATS# 9000558-936

6.13 SPR 900394, Configuration Management, MATS# 9001003-936

6.14 0PGP03-ZA-0010, Plant Procedure Adherence and Implementation and Independent Verification

6.15 SER 82-075, Mispositioned Containment Spray Header Manual Isolation Valve, MATS# 8501200-936

6.16 SER 84-056, Mispositioning of Valves and Controls Disabled Safety Systems, MATS# 8401858-936, 8500004-867, 8500031-866, 8500090-860

6.17 SPR 910128, 1-CS-0017A Found Unlocked, MATS# 9100414-936

6.18 RFA 91-0771

6.19 0PGP03-ZO-0039, Operations Configuration Management

6.20 IEN 84-046, Circuit Breaker Position Verification
Mats# 8400055-860, 8402181-936, 8500015-860

6.21 NOI 87-08-41, Pipe Caps, LCTS#8700441-936

6.22 Owner Communication Plan

6.23 SPR 910010, EHC leak

6.24 0POP04-ZO-0001, Control Room Evacuation

6.25 Locked Valve Reduction Program

6.26 Operational Readiness Plan, Section V.C.3

6.27 0POP01-ZA-0019, Locked Component Key Control

6.28 ST-HS-AE-4895, Response to NRC Inspection Report 94024

FC-94-1062

7.0 SUPPORT DOCUMENTS

7.1 Addendum 1, Plant Systems Requiring Independent Verification

7.2 Addendum 2, POD Standard For Determining Valve Position

7.3 Addendum 3, Locked Component Deviation Log (Typical)

7.4 Emergency Operations Equipment Inventory Checklist (-1)

ADDENDUM 1
PLANT SYSTEMS REQUIRING INDEPENDENT VERIFICATION
(Page 1 of 2)

1) Auxiliary Feedwater (AF)

2) Chemical Volume and Control System (CV)

3) Component Cooling Water System (CC)

4) Containment HVAC - RCFC's & Carbon Units (HC)

5) Containment Hydrogen Monitoring System (CG)

6) Containment Isolation Valves, Piping, Supports, & Penetrations

7) Containment Spray System (CS)

8) Control Room & EAB HVAC Systems (HE)

9) Essential Chilled Water System (CH)

10) Essential Cooling Water (EW)

11) ESF Diesels & Support Systems (Fuel Oil downstream of locked closed isolations) (DG, DO, SD downstream of air receivers, PD)

12) ESF & Class 1E Electrical (DJ, PC, PK, PL, PM, VA)

13) ESF Status Monitoring System (SM)

14) Feedwater - FWIV's to Steam Generators (FW)

15) Fire Protection Systems (FP)

16) Fuel Handling Building HVAC (HF)

17) Gaseous Waste Release System (Portions of WG downstream and inclusive of VE-0032 and VE-0033)

18) Leak Rate Testing System (IL)

19) Liquid Waste Release System (Portions of WL downstream and inclusive of WL-FV-4077 to OC)

ADDENDUM 1
PLANT SYSTEMS REQUIRING INDEPENDENT VERIFICATION
(Page 2 of 2)

20) Main Steam - Steam Generators to MSIV's (MS)

21) Mechanical Auxiliary Building HVAC (HM)

22) Post Accident Sampling System - to OCIV (AP)

23) Primary Sampling System - to OCIV (PS)

24) Reactor Coolant System (RC)

25) Reactor Makeup Water System (RM)

26) Residual Heat Removal System (RH)

27) Safety Injection System (SI)

28) Solid State Protection System (SP)

29) Spent Fuel Cooling System (FC)

30) Steam Generator Blowdown System - to OCIV (SB)

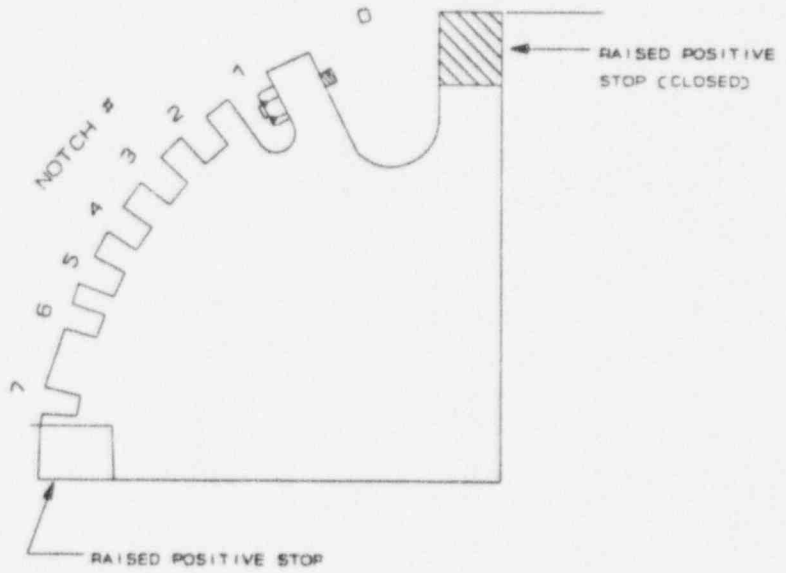
ADDENDUM 2
POD STANDARD FOR DETERMINING VALVE POSITION
(Page 1 of 1)

Hand Wheel Operated Valves (Rising Stem, Non-rising Stem, Globe, Butterfly) :
Count the number of turns from the fully closed position when the handwheel engages the stem. Count turns only to the nearest 1/8 turn.

Knocker Valves:
Count the number of turns from the fully closed position when the handwheel engages the stem. Count turns only to the nearest 1/8 turn.

T-handle Valves:
Determine the number of degrees open from the closed position.

Notched Valves:
Count all notches from the closed position NOT including the closed notch as shown in the figure below.



ADDENDUM 3
LOCKED COMPONENT DEVIATION LOG (TYPICAL)
(Page 1 OF 1)

STP 2099 (10/91)

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION

Locked Component Deviation Log

UNIT ___

COMPONENT NUMBER	REQUIRED LOCKED POSITION	REASON	SS/US APPROVAL INIT/TIME/DATE	NEW POSITION	POSITIONED BY	RESTORED TO REQUIRED POSITION BY INIT/TIME/DATE	IV'D BY

THIS FORM, WHEN COMPLETED, SHALL BE RETAINED FOR A MINIMUM OF 5 YEARS.

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST

0POP01-ZA-0001-1
(Page 1 of 7)

LOCATION	CONTENTS
SFP Emergency Fill Hose Box (68 ft FHB Operating Deck)	_____ 9 - 1 1/2 inch 100 ft Fire Hoses _____ 3 - 1 1/2 inch Male X 1 inch Female Fittings
SFP Gate Seal Emergency N_2 Bottle (68 ft FHB Operating Deck - Unit 1 inside PASS room)	_____ 1 - N_2 Cylinder (greater than 800 psig)
Sound Powered Phone Box (10 ft MAB "C" Train CCW Pump Room 067F)	_____ 1 - Sound Powered Headset _____ 1 - 25 ft Headset Extension Cord _____ 1 - Flashlight (Check Batteries) _____ 1 - Keys: CAT50, CAT60, 5A-1(5C-1), 5A-2(5C-2) _____ 1 - Procedure: 0POP04-ZO-0001, Control Room Evacuation
Emergency Operations Locker 11(21) (MAB 10 ft Inside North Stairwell)	_____ 1 - 8 inch Crescent Wrench _____ 1 - 12 inch Crescent Wrench _____ 1 - Wire Cutters _____ 2 pr - Leather Gloves _____ 1 - 14 inch Pipe Wrench _____ 1 - 1 7/8 inch Eye Bolt _____ 1 - Oxygen Sniffer (Check Batteries) _____ 1 - Safety Belt _____ 3 - Portable Lanterns (Check Batteries) _____ 1 - Ratchet with 1 inch allen head socket _____ 1 - Set of EOPs

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST
0POP01-ZA-0001-1
(Page 2 of 7)

LOCATION	CONTENTS
Emergency Operations Locker 12(22) (41 ft MAB Next to Elevator)	_____ 1 - 8 inch Crescent Wrench
	_____ 1 - 12 inch Crescent Wrench
	_____ 1 - Wire Cutters
	_____ 2 pr - Leather Gloves
	_____ 1 - 14 inch Pipe Wrench
	_____ 1 - Safety Belt
	_____ 3 - Portable Lanterns (Check Batteries)
	_____ 1 - Ratchet with 1 inch allen head socket
	_____ 1 - Set of EOPs
Sound Powered Phone Box (60 ft EAB "C" TRAIN SWGR, Room 318)	_____ 1 - Sound Powered Headset
	_____ 1 - 50 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Flathead Screwdriver
	_____ 1 - Contactor Depressing Device
	_____ 1 - Fuse Disconnect Tool
	_____ 1 - Keys: CAT50, CAT60
	_____ 1 - Procedure: 0POP04-ZO-0001

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST
0POP01-ZA-0001-1
(Page 3 of 7)

LOCATION	CONTENTS
Sound Powered Phone Box (10 ft EAB "A" Train SWGR, Room 010)	_____ 1 - Sound Powered Headset
	_____ 1 - 25 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Flathead Screwdriver
	_____ 1 - Contactor Depressing Device
	_____ 1 - Fuse Disconnect Tool
	_____ 1 - Keys: CAT50, CAT60
	_____ 1 - Procedure: 0POP04-ZO-0001
Sound Powered Phone Box (10 ft EAB Auxiliary Shutdown Panel,Room 015)	_____ 1 - Sound Powered Headset
	_____ 1 - 25 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Keys: CAT50, CAT60, 5A-1(5C-1), 5A-2(5C-2)
	_____ 1 - Procedure: 0POP04-ZO-0001
Sound Powered Phone Box (35 ft EAB "B" Train SWGR, Room 212)	_____ 1 - Sound Powered Headset
	_____ 1 - 50 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Flathead Screwdriver
	_____ 1 - Contactor Depressing Device
	_____ 1 - Fuse Disconnect Tool
	_____ 1 - Keys: CAT50, CAT60
	_____ 1 - Procedure: 0POP04-ZO-0001

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST

0POP01-ZA-0001-1
(Page 4 of 7)

LOCATION	CONTENTS
Emergency Operations Locker 13(23) (35 ft EAB Hallway Between CR and Kitchen)	_____ 1 - 8 in Crescent Wrench
	_____ 1 - 12 in Crescent Wrench
	_____ 1 - 14 inch Pipe Wrench
	_____ 1 - Wire Cutters
	_____ 1 - Safety Belt
	_____ 1 - Sound Powered Headset
	_____ 1 - Fuse Puller
	_____ 1 - 3 Portable Lanterns (Check Batteries)
	_____ 1 - Set of EOPs
Sound Powered Phone Box (35 ft DG BLDG, "A" Train)	_____ 1 - Sound Powered Headset
	_____ 1 - 25 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Keys: CAT50, CAT60, 5A-1(5C-1), 5A-2(5C-2)
	_____ 1 - Procedure: 0POP04-ZO-0001
Sound Powered Phone Box (35 ft DG BLDG, "B" Train)	_____ 1 - Sound Powered Headset
	_____ 1 - 25 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Keys: CAT50, CAT60, 5A-1(5C-1), 5A-2(5C-2)
	_____ 1 - Procedure: 0POP04-ZO-0001

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST
0POP01-ZA-0001-1
(Page 5 of 7)

LOCATION	CONTENTS
Sound Powered Phone Box (35 ft DG BLDG, "C" Train)	_____ 1 - Sound Powered Headset
	_____ 1 - 25 ft Headset Extension Cord
	_____ 1 - Flashlight (Check Batteries)
	_____ 1 - Keys: CAT50, CAT60, 5A-1(5C-1), 5A-2(5C-2)
	_____ 1 - Procedure: 0POP04-ZO-0001
Emergency Operations Locker 14(24) (10 ft IVC Stairwell)	_____ 1 - 8 inch Crescent Wrench
	_____ 1 - 12 inch Crescent Wrench
	_____ 1 - 14 inch Pipe Wrench
	_____ 1 - Wire Cutters
	_____ 2 pr - Leather Gloves
	_____ 1 - Safety Belt
	_____ 2 - Portable Lanterns (Check Batteries)
	_____ 1 - Set of EOPs

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST
0POP01-ZA-0001-1
(Page 6 of 7)

LOCATION	CONTENTS
Emergency Operations Locker 15(25) (55 ft TGB Next to SE Exit Door)	_____ 1 - 8 inch Crescent Wrench
	_____ 1 - 12 inch Crescent Wrench
	_____ 1 - 14 inch Pipe Wrench
	_____ 1 - Wire Cutters
	_____ 1 - Safety Belt
	_____ 2 - Sound Powered Headsets
	_____ 2 - 75 ft headset extension cords
	_____ 2 pr - Leather Gloves
	_____ 3 - Portable Lanterns (Check Batteries)
	_____ 1 - Set of EOPs
	_____ 1 - SG PORV Manual Hydraulic Pump With Hoses
Emergency Operations Locker 16(26) (29 ft TGB Next to Basement Shelter)	_____ 1 - 8 inch Crescent Wrench
	_____ 1 - 12 inch Crescent Wrench
	_____ 1 - 14 inch Pipe Wrench
	_____ 1 - Wire Cutters
	_____ 1 - Safety Belt
	_____ 1 - Fuse Puller
	_____ 2 pr - Leather Gloves
	_____ 3 - Portable Lanterns (Check Batteries)
	_____ 1 - Set of EOPs

EMERGENCY OPERATIONS EQUIPMENT INVENTORY CHECKLIST
0POP01-ZA-0001-1
(Page 7 of 7)

LOCATION		CONTENTS
Sound Powered Phone Box (29 ft TGB 13.8 KV SWGR Room)	_____	1 - Sound Powered Headset
	_____	1 - 25 ft Headset Extension Cord
	_____	1 - Flashlight (Check Batteries)
	_____	1 - Key: CC334
	_____	1 - Procedure: 0POP04-ZO-0001
EHC Response Locker (83 ft TGB, Turbine Deck)	_____	3 - Plastic Suits
	_____	3 - Pairs of Plastic Gloves
	_____	3 - Pairs of Tyvec Shoe Covers
	_____	3 - SCBA Respirators (Respirators are located in the 83 ft TGB East Stairway Access)
Emergency Operations Locker 17(27) (Top of AFWST)	_____	1 - Universal Spanner Wrench
	_____	2 - 2 1/2 inch, 50 foot Fire Hoses
DGFOST Emergency Fill Locker	_____	1 - 4 inch female to 2 1/2 inch female coupling
	_____	1 - Wire Cutters
	_____	2 - 1 1/16 inch wrench
	_____	2 - Face shields
	_____	1 - 12 inch cressent wrench
	_____	4 - 2 1/2 inch, 50 ft fuel hoses

All Boxes Locked Closed _____

R07857
1

Field Change Form
0PAP01-ZA-0102-10
(Page 1 of 1)

SECTION A - DESCRIPTION			
1. One-Time-Only FC? [ ] YES [X] NO		2. FC No. 94-1062	
3. Procedure No./ Rev. No.: 0POP03-ZA-0001 Rev. 7			
4. Procedure Title: Plant Operations Department Administrative Guidelines			
5. Classifications: [ ] PORC	[ ] Safety Related	[X] Non-Safety Related	
	[X] Quality Related	[ ] Non-Quality Related	
	[ ] Station	[X] Department	
6. Description of Changes(s): Deleted Step 5.7.6. Added Reference 6.28, ST-HS-AE-4895.			
7. Reason for change Check all that apply (Refer to Addendum 3)			
[X] Administrative/Clarification	[ ] Procedure technically incorrect		
[X] Plant condition/Method Chg.	[ ] Regulatory change		
[ ] Internal commitment	[ ] Tech/Design Document		
	[X] Other (Specify)	ST-HS-AE-4895	
8. [1] FCs against this Rev. Excluding One-Time-Only	9. Affected/additional pgs. 15, 19	10. Procedure changes(s) required to other unit/train. (Y/N, tracking no.) N	
11. PREPARER (SIGN/PRINT) A.J. Ochs			Date 9/28/94
SECTION B - APPROVAL			
12. TECHNICAL REVIEWER (SIGN/PRINT) J. Alder			Date 9/28/94
13. COGNIZANT MANAGER CONCURRENCE (SIGN/PRINT) (An SRO signature is required for Safety-Related Procedures.) W. Dowdy	W. Dowdy		Date 9/28/94
14. AUTHORIZED INDIVIDUAL (SIGN/PRINT) C. Biedr			Date 9-28-94
PROCEDURES THAT REQUIRE PORC per ADDENDUM 1			
15. Approved by Plant Manager (SIGN/PRINT)			Date

Training Required? [ ] YES [X] NO

Cully

Rev. 1
April 16, 1993

PORC Review Evaluation

SPR 940722

Subject _____

_____

_____

_____

Does the subject SPR meet any of the following criteria:

		YES	NO
1)	Concerns a REPORTABLE EVENT?	___	✓
2)	Concerns a significant operating abnormality or significant deviation from normal and expected performance of plant equipment or systems that affect nuclear safety?	___	✓
3)	Concerns unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety?	___	✓
4) *	Concerns any accidental, unplanned, or uncontrolled radioactive release?	___	✓
5)	Concerns the violation of: • Codes • Regulations • Orders • Technical Specifications • Operating Licensing Requirements having nuclear safety significance?	___	✓
6)	Concern the abnormal degradation of systems designed to contain radioactive material?	___	✓

If any of the above questions are answered YES, THEN the subject SPR SHALL be submitted to PORC.

C Bondreau
Evaluator

2/21/94
Date

* An SPR that concerns uncontrolled radioactive release requires review and approval by the Plant Manager.

HP

APR 0 4 RECD

STP 476 (04/93) REV 2

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION

OPGP03-ZX-0002

STATION PROBLEM REPORT

CAG | CATEGORY ☐1 ☐2 ☐3 ☒4 ☐5 ☐6 | SPR NO. 940777

ORIGINATOR

PART 1: IDENTIFICATION OF CONCERN

A. UNIT # ☒ 1 ☐ 2 ☐ COMMON ☐ BOTH

INITIATED: NAME Greg Janek DEPT Ops
POSITION Unit Supervisor PHONE NO. 8610
DATE 3-30-94 TIME 1040

DISCOVERY: DATE 3-30-94 TIME 1000

EVENT: DATE 3-22-94 TIME

IMMEDIATE SUPERVISOR: _____ DATE _____ TIME _____
SIGNATURE (NOT REQUIRED)

COMMENTS _____

B. PROBLEM DESCRIPTION

SR# 170195 was given Work Start on 12-1093 to replace a light fixture in AFWST Pit "C", EM did not have the correct fixture to replace the old one so the pit was closed. On 3-22-94 AFWST Pit "C" was opened to replace the light fixture and then closed and sealed. This was done without additional Work Start. Per OPOP02-AF-0001 step 4.17 when the Security Barrier is breached, then the valves shall be verified to be in their required position prior to closure. I cannot find a copy of the lineup OPOP02-AF-0001-10 for Train "C" AFWST Pit for 3-22-94.

C. IMMEDIATE COMPENSATORY OR REMEDIAL ACTIONS TAKEN [ ] CONTINUATION SHEET ATTACHED

Notified Shift Supervisor.

D. IDENTIFICATION [ ] CONTINUATION SHEET ATTACHED

SYSTEM AF COMPONENT NAME AFWST Pit

COMPONENT NO. _____ BLDG n/A ROOM Bay C

INSTRUCTIONS FOR PART 1 COMPLETION

DESCRIBE YOUR CONCERN GIVING AS MUCH INFORMATION AS POSSIBLE.
FILL IN ALL APPLICABLE SECTIONS OR ATTACH DOCUMENTATION.
INDICATE WHAT, WHEN, WHO, WHY, WHERE, HOW. LIST ANY REFERENCES.

4.7.1.2.1

DESCRIBE ALL IMMEDIATE COMPENSATORY/REMEDIAL ACTIONS TAKEN

NOTE: IF POTENTIALLY REPORTABLE, OR IF ANY DOUBT EXISTS REGARDING REPORTABILITY, THEN DELIVER IMMEDIATELY TO THE SHIFT SUPERVISOR. OTHERWISE, DELIVER TO THE CAG ADMINISTRATOR.

SPR No 940777

SHIFT SUPERVISOR\LICENSING

PART 2: REPORTABILITY

	MODE	Rx Power	Rx Press	Rx Temp	Trip ?
A. UNIT 1	1	75	2250	566	N
UNIT 2	6	0	0	90	N

ESF ACTUATION NA INITIATING SIGNAL _____

B. OPERABILITY/REPORTABILITY DETERMINATION

[ ] OPERABILITY REVIEW REQUIRED [ ] WITHIN 24 HOURS [ ] OTHER (See Comments)

[ ] REPORTABLE PER _____ WITHIN _____
LAW/PERMIT/LICENSE TIME: HOURS

[ ] REPORTABILITY REVIEW REQUIRED [X] NOT REPORTABLE

COMMENTS _____

NOTIFICATIONS

DUTY PLANT MANAGER	[ ] N/A	PERSON CONTACTED _____	DATE/TIME _____	INITIALS _____
NRC RESIDENT INSP	[ ] N/A	PERSON CONTACTED _____	DATE/TIME _____	INITIALS _____
NRC OPS CENTER	[ ] N/A	PERSON CONTACTED _____	DATE/TIME _____	INITIALS _____
OTHER	[ ] ~~N/A~~	PERSON CONTACTED _____	DATE/TIME _____	INITIALS _____

SHIFT SUPERVISOR [signature] DATE/TIME 3/30/94 1440

C. REPORTABILITY REVIEW

[ ] REPORTABLE PER _____ WITHIN _____ [X] NOT REPORTABLE
LAW/PERMIT/LICENSE TIME: HOURS

LICENSING REPRESENTATIVE [signature] DATE 3/31/94

D. WRITTEN REPORT TO NRC TYPE _____ DUE DATE _____

CAG

PART 3: ACTION ASSIGNMENT

Outage * DW 4/4/94

CAG RECIEVED DATE 3/31/94 TIME 0653

EVENT CODES EH2D ~~EL5~~ FL1

DEPARTMENT ~~MAINT. SUPPORT~~ ACTION INVESTIGATION DUE 5-29-94

DEPARTMENT _____ ACTION _____ DUE _____

DEPARTMENT _____ ACTION _____ DUE _____

CAG/QA/QC/APPROVAL AUTHORITY

PART 4: ACTIONS TO BE COMPLETED

[Remedial/Compensatory (R) or corrective (C)]

* Transferred to Outage from Maint. Support per PRG 5/4/94

PRIORITY _____ DUE DATE _____ APP. AUTHORITY _____ DATE _____

PRIORITY _____ DUE DATE _____ APP. AUTHORITY _____ DATE _____

CAT. 5 CLOSURE _____ APPROVAL AUTHORITY _____ DATE _____ QA/QC _____ DATE _____

CAT. 5/6 CLOSURE _____ CAG _____ DATE _____

[ ] CONTINUATION SHEET ATTACHED

STATION PROBLEM REPORT

I: **EVENT DESCRIPTION**

Station Problem Report (SPR) 94-0777 states that MSSD personnel failed to obtain Operations work start approval for service request (SR) LG-170195 on "03/22/94". The service request was generated to support MSSD opening the Aux Feedwater Storage Tank (AFWST) C, valve pit to repair a broken light fixture. Subsequent initiator reviews verified the AFWST Valve Pit was entered on "03/22/94, but valve lineup verifications required by Operations Procedure "OPOPO2-AF-0001" prior to the valve pit closure could not be found.

The SPR identified the only Operations work start approved opening of the AFWST valve pit for MSSD lighting repairs occurred on 12/10/93, (OTL 1-93-479). Upon completion of a pre-job inspection of the light, Control Room Personnel were notified parts were not available and the repair would have to be rescheduled. The AFWST valve pit hatch was then re-closed and sealed.

Reviews of the (SR) Work Package documentation, Operations Control Room and Security Force Posting Logbooks, RMS records and an interview with the responsible MSSD Supervisor, revealed the following:

- Contrary to the stated SPR concern, Equipment Clearance Order (ECO-40873) was authorized and issued to MSSD to open the Unit 1 AFWST valve pit hatch and perform the light fixture repairs on "03/22/94".

- Unit 1, AFWST (A - D) train valve pits were opened several times for work activities from "12/03/93 - 03/24/94", without the procedure required valve lineup verifications being performed. Only one security posted AFWST valve pit logbook entry for Operations inspections was found to have occurred, (during this period).

I: **ATTACHMENT**

Provides a Chronological listing of the Unit 1 AFWST valve pits opening and closing activities, (during this period).

II: **EVENT SIGNIFICANCE**

Failure to perform Operations procedure valve lineup verifications can adversely affect system\component operability and STP Technical Specification requirements. 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, 1978. Item 1 of Appendix A states that the licensice will have administrative procedures to control safety-related activities. Configuration Control was not maintained contrary to the following requirements:

1) Feedwater procedure "OPOPO2-AF-0001, step 4.17" and Plant Operations Department Administrative procedure "OPGPO1-ZA-0001, Step 2.4, require in part, if the AFWST Valve pit security barrier is breached, THEN valves in the AFWST valve pit shall be verified according to the applicable lineup, just prior to the final closure of the security barrier.

2) OPGO3-ZO-ECO1, Equipment Clearance Orders, procedure section 5.14.7, states in part, WHEN all Acceptors have released the ECO, THEN the Issuing Authority shall ensure that the restoration position shall be completed for all components. Section 5.14.7.1/8.2, states in part, ENSURE restoration positions are complete for locked and throttled valves and that they are consistent with Plant Conditions and Technical Specifications.

STATION PROBLEM REPORT

III: **EVENT ANALYSIS**

Per Operations Suppor the AFWST pit valves were not unlocked and therefore the event is not reportable.

SEE ATTACHMENT II July 5, 1994 MEMO # POD94070655 From W. S. Blair to Unit 1 Shift Supervisor Reportability Review for SPR 940777".

IV: **CAUSE OF EVENT**

The apparent causes for this event are as follows:

1) Auxiliary Feedwater (AF) procedure "OPOPO2-AF-0001" and Operations Administrative Procedure "OPGPO1-ZA-0001" have a potential unnecessary requirement to perform valve lineup verifications when the AFWST valve pit is opened, just prior to closure. The AF Technical Specification pump suction in line valves to the tank are locked in there required position.

2) Lack of Operations ECO\OTL AFWST valve pit configuration control and the subsequent failure by Operations to perform procedural locked valve position verifications. The investigation reveled the lost Aux Feedwater procedure OPOPO2-AF-0001-10, valve lineup documentation was not found due to Operations taking credit, (in some cases) for past lineups dating back to November 1993. Without verification of the valve pits hatch actual opening and closing status, lineups have been waived and\or credit taken by Operations assuming that the AFWST valve pits had remained closed, locked and un-opened.

   Operations personnel on three different occurrences would not consider reportability reviews or re-verification of the AFWST pit valve lineups. The AFWST pit valves were not re-inspection until June 1994, after the investigation had proven potentially all of the of AFWST valve pits had been opened\closed without the required lineup verifications. Operations personnel feel the identified valve lineup requirements are not valid and an SPR investigation is necessary.

3) Procedures do not define limitations and\or requirements for opening locked barriers. Per Security, in the past if personnel had Operations work start authorized ECOs, barriers have been unlocked and posted. Security Access Control Procedure "OSDPO2-ZS-0027", Rev. 16, section 3.3 and 4.1.5., Does not require Security Force personnel to notify Operations Shift\Unit Supervisors prior to the opening or closing of any site barriers or locks.

   3.a - Plant Operations Department Administrative Guidelines Procedure "OPOPO1-ZA-0001, REV 7", Section 5.3.6, locked valve program does not clarify\identify STP Security Forces as authorized to unlock Operations controlled barriers and/or have keys to their locked components.

4) Ineffective utilization of "SECURITY BARRIER BREACH PERMIT" process. Permits are not scheduled, Per the Security Force Supervisor permit requirements can and are waived. Security uses manual posting logsheets not the permits. AFWST valve pit work package SR:LG-170195 contained security permits, but were not completed for the work performed and do not have the required dates, times, and craft responsible supervisor information for breaching and/or restoring the barrier.

STATION PROBLEM REPORT

IV: CAUSE OF EVENT

5) Work Process Program Procedure "OPGP03-ZA-0090" requirements for the planning, scoping, scheduling, and control of work activities were not effectly implemented and\or followed.

5a The SR LG-170195 was scoped as a General Lighting activity and was coded with a general lighting "LG" system identifier. The work was then Scheduled as a "fill in activity" and viewed as a non-train safety related issue with no impact to plant startup activities.

5b The SR work package instructions did not identify Operations or Security requirements for performing AFWST valve pit activities. "OPGP03-ZA-0090" section 3.3.2.7, requires in part, that Planners shall identify work for penetrations or barriers that could provide unauthorized access into plant vital or protected areas and a review of these with the Security Force Supervisor will be performed (DR 90-30; IEN 85-079).

5c A review of the Unit 1, Cue schedule reports for the Aux Feedwater System indicates the only job scheduled for the pit was the light fixture repair. Security logbooks indicate the pit was opened several times to support work activities.

I: REMEDIAL ACTIONS:

No, immediate remedial corrective actions where taken.

CORRECTIVE ACTIONS:

C1 Operations will revise the applicable sections of Auxiliary Feedwater procedure "OPOP02-AF-0001", Operations Administrative Department Guidelines procedure "OPOP01-ZA-0001", and as necessary Equipment Clearance Orders, "OPGP03-ZO-EC01" an Operations Configuration Management Procedure, "OPGP03-ZO-0039" to incorporate the following:

a. Delete\change the AFWST valve lineup verification requirements. Example, for outages the AFWST valve pit should only be required to be inspected one time for system restoration and testing.

b. Clairify requirements to ensure valve lineups are properly identified, tracked, scheduled and performed; including after the opening and closing of locked barriers\doors.

C2 Identify to Security, access limitations and requirements for opening barriers that require prior notification of Control Room Staff, such as (Fuel Handling Bldg Doors, AFWST Valve Pits, ECW Roof Plugs, etc) for incorporation into their procedures.

C3 Attach information labels to barriers identifing requirements.

DUE DATE 9/15/94 RESP MGR [signature]
(C1; a, b, 2 & 3) Operations Support MGR

C4 Ops. Managers will provide training to personnel on procedure changes.

a. DUE DATE 9/15/94 RESP MGR [signature]
Operations MGR UNIT 1

b. DUE DATE 9/15/94 RESP MGR [signature]
OPERATIONS MGR UNIT 2

STATION PROBLEM REPORT

I: CORRECTIVE ACTIONS

C5 Nuclear Security will revise the applicable sections of Access Control Procedure "OSDP02-ZS-0027" to incorporate the following:

a. Incorporate requirements to notify Operations Shift\Unit Supervisors prior to the opening or closing of to be "identified" site barriers, doors and locks that can effect system components or plant operability, (Example, AFWST valve pits, ECW Doors, etc).

C6 Nuclear Security will review and identify the requirements for the utilization of "SECURITY BARRIER BREACH PERMITS". The information will be provided to the Work Control Department for incorporation into Work Process Procedure "OPGP03-ZA-0090" and the Planner\Schedulers Guide.

Per 7/15 Telc.

Cont. 10
DUE DATE 9/15/94 RESP MGR Frank R. Inman
(C5, a & C6) Security MGR.

C7 Work Control will evaluate and revise the applicable sections of the Planners & Schedulers Guide and\or the Work Process Program Procedure "OPGP03-ZA-0090", to incorporate the following:

a. Section 3.3.2.7 - Define preparation responsibilities and clarify planning requirements for security related barrier\penetration packages.

b. Evaluate, develop and issue work planning and scheduling guidelines for security barrier\penetration permits, system coding, and area locations to support management of OTL\ECO configuration control requirements. Identify security breach boundary areas in planners & schedulers guide.

C8 Evaluate flagging Security Barriers\Penetrations in the applicable work management system databases and ECO\OTL Computer system with indicators, to lock and keep work documents from printing until breach and operability reviews have been completed.

DUE DATE 10/15/94 RESP MGR Jimmie Ferguson
(C7, a, b & C8) Work Control MGR. (Fr John Corbon)

Cont (7/15 Ltr)

VII: TREND CODES

1) EA4 ~~77~~ -OPS, Configuration Control (Work Under Verification) EL1C -Operations
2) EH2D -Admin Procedure Adherence EL1H -Security
3) EH3A -Admin OPS Procedure Accuracy EL1D -Maintenance
4) EJ1N -Maintenance Improper Planning

Cont
CF3b ~~C1a3b~~ -System Alignment requirements not verified
C 1k -Inadequate work package
C 4b ~~CJa4D~~ -~~Procedures Inaccurate~~ Documents not followed correctly
CL5a -OPS Untimely Problem Response

ADDITIONAL INFORMATION:

ATTACHMENT I

SPR 940777 AFWST ACTIVITY MATRIX

DATE	AFWST PIT	Owner	L/N	ACTIVITY	COMMENTS
12/03/93	N/W	OPS	NO	Hatch Opened and Closed . OPS Opened OTL for MSS # C Pit Light Repair	# 3,Personnel worked in pit
12/10/93	N/E	MSSD	NO	Fixture Removed under OTL, NOT ECO	Parts not available hatch closed and resealed.
01/03/94 - 01/05/94	W	MSSD, I&C,	NO	MOD, I&C & Painting work performed in pits per security.	Hatch opened & closed
01/09/94	?	CO&A	NO	Sample Taken Hatch Opened & Closed	Time in pit to collect sample, approx. 2 min.
01/11/94	?		NO	Log indicates personnel in Pit performing work	Hatch Opened & Closed
02/04/94	S/W		?	Hatch Opened & Closed, 2 RPOs logged as being in Pit	AFWST West vlv lineup hard copy data sheet states credit taken for lineup performed on 1/19/94? This does not support
02/07/94	ALL	OPS	?	OPS OTL indicates valves in required operable lineup configuration	
	ALL	OPS	?	Plant enters Mode 3, 1800 Hrs	
02/18/94	2/8/94	OPS	?	Initical Crit	
02/28/94	?	OPS	?	SG TUBE LEAK FORCED OUTAGE	
03/19/94	ALL	OPS	?	Plant MODE 3	
03/20/94	ALL	OPS	?	MODE 2, 2003 HRS	
03/22/94	N/W	MSSD	NO	Hatch Opened & Closed	MSSD Replaced PIT Light
03/24/94	?	MSSD	NO	Hatch Opened & Closed	Work in pit performed
06/22/94	ALL	OPS	NO	OPS did not find valve lineups	
06/23/94	ALL	OPS	Y	OPS pulled hatch cover for C Pit & verified lineup. Advised them other pits also opened.	

Houston Lighting & Power Company

OFFICE MEMORANDUM

To Unit 1 Shift Supervisor

July 5, 1994
POD94070655

From W. S. Blair

Subject **Reportability Review for SPR 940777**

SPR 940777 identified that the AFWST Valve Pit had been entered and the required valve lineup verification had not been performed prior to closing the pit cover. Subsequent investigation revealed that several entries had been made into the valve pit without performing the valve lineup. A reportability review of these events was requested due to the possibility of making a mode change with AFW inoperable and possible missed surveillances due to not verifying manual valve position per the surveillance requirements.

Technical Specification surveillance requirement 4.7.1.2.1 requires, in part:

"Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by:
   3) Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in its correct position;..."

All manual (non-automatic) valves in the auxiliary feedwater flowpath, including the valves located in the AFWST valve pit, are locked in their correct position. Therefore, no monthly (31 days) manual valve position verification is required to fulfill this surveillance requirement.

Current procedural guidance (0POP02-AF-0001) on performing alignment of the valves in the AFWST valve pit is as follows:

4.18 Valves located in the AFWST valve pit are not required to be checked unless the security barrier is breached. IF the AFWST valve pit security barrier is breached, THEN valves in the AFWST valve pit SHALL be verified according to the applicable lineup just prior to the final closure of the security barrier.

This guidance was in response to the 1989 Configuration Management Assessment. It was identified that an exemption from performing routine lineups and verification of these valves did not exist. The above guidance was to address administrative guidance concerning performance of lineups, not to address Technical Specification surveillance requirements.

As shown above, the requirement to perform a valve position verification prior to the final closure of the security barrier is an administrative requirement to allow exemption from routine lineups of the valves located in the pit. Technical Specification surveillance requirements are satisfied, thus no surveillances were missed and no mode changes were made with AFW inoperable. **Therefore, this event is determined to be NOT REPORTABLE.**

Nuclear Licensing Concurrence

RLG/rlg

HL&P 1008A(3-90)

Houston Lighting & Power Company

OFFICE MEMORANDUM

To D.A. Daniels

September 6, 1994
POD94090830

From D.L. Musick for

Subject **Supplement to SPR 940777**

CAUSE OF EVENT 1) of SPR 940777 identified the Auxiliary Feedwater (AF) procedure "0POP02-AF-0001" and Operation Administrative Procedure "0POP01-ZA-0001" as having a potential unnecessary requirement to perform valve lineup and verifications when the AFWST valve pit is opened, just prior to closure.

CORRECTIVE ACTION C1) states that Operations will revise the applicable sections of Auxiliary Feedwater (AF) procedure "0POP02-AF-0001" and Operation Administrative Procedure "0POP01-ZA-0001". and as necessary, Equipment Clearance Orders "0PGP03-ZO-EC01" and Operation Configuration Management Procedure "0PGP03-ZO-0039".

Plant Operations Management has reviewed the proposed corrective actions and determined that the current requirements for performing a AFWST valve lineup as established in Auxiliary Feedwater (AF) "0POP02-AF-0001" and Operation Administrative "0POP01-ZA-0001" procedures are appropriate. By ensuring the AFWST valve lineup is performed just prior to final closure of the valve pit, Plant Operations can TAKE CREDIT FOR the AFWST Pit Lineup being performed as long as it can be demonstrated that the AFWST Pit has NOT been breached. This action precludes the requirement to access the pit whenever a routine valve lineup is performed.

Plant Operation Management believes that the additional specified CORRECTIVE ACTIONS of SPR 94077 more than adequately address necessary corrective actions and that no Plant Operations procedure changes are required.

Plant Operations considers CORRECTIVE ACTION C1 of SPR 940777 closed. Please delete Corrective Actions C4a and C4b since no procedure changes are required, then no training is necessary.

Outage Concurrence *

RAS/alm

c: SPR 940777 file

SPR SCREENING CRITERIA FOR START-UP ISSUES

SPR NUMBER 940777

YES	NO	CRITERIA
[ ]	[/]	Is the problem described in the SPR needed to comply with the STP Technical Specifications or other license commitments?
[ ]	[/]	Do the consequences of not correcting the problem affect the ability of a safety system to satisfy its design function?
[ ]	[/]	Do the consequences of not correcting the problem create or could create a condition that jeopardizes the safe or reliable operation of the Units?
[ ]	[/]	Do the consequences of not correcting the problem create or have the potential to create a condition that will or could affect the station's ability to effectively support unit operation or mitigate emergency situations?
[ ]	[ ]	Does the problem described in the SPR impact the reliability of the system to perform its design function?
[ ]	[/]	Is the problem described in the SPR considered to be a mode restraint? (which mode - 1[], 2[], 3[], 4[], 5[])

If the answer to any of the above criteria is YES, the problem described in the SPR needs to be corrected prior to mode change or unit start-up, unless justification for deferral is provided.

COGNIZANT DEPT. QS. OPERATIONS J. J. Von Suskil

CAG DATABASE UPDATED Brenda Williams DATE 3-31-94

ADDENDUM 6
TYPICAL SPR APPROVAL/CLOSURE FORM
(Page 1 of 1)

STATION PROBLEM REPORT
REGARDING

SPR # 940777
Category 4

AFWST valve PIT ECO concern and failure to perform recd valve line ups

APPROVALS

	ORIGINAL (Signature/Date)	REV 1 (Signature/Date)	REV 2 (Signature/Date)
PREPARER	Ron Thaulson 7/11/94		
Approval Authority	7/12/94		

REVIEW/APPROVAL

PORC [ ] YES [✓] NO

	ORIGINAL (Signature/Date)	REV 1 (Signature/Date)	REV 2 (Signature/Date)
CAG	C Bondreau 7/21/94		
QA (IF APPLICABLE)			
PORC (Mtg No./Date)			
PLANT MGR			

CLOSURE APPROVALS

	ORIGINAL (Signature/Date)	REV 1 (Signature/Date)	REV 2 (Signature/Date)
CAG ADMIN.			
QA (IF APPLICABLE)			

POD 94090864
Trax #1809

SPR ACTION COMPLETION VERIFICATION FORM

1. SPR#: *SPR 940777* Action Item # (if known): *C2*

2. ACTION #(s) STATEMENT(s) *Identify to Security, access limitations and requirements for opening barriers that require prior notification of Control Room Staff, such as (FHB doors, AFWST Valve Pits, ECW Roof Plugs, etc) for incorporation into their procedures.*

3. THE ABOVE ACTION HAS BEEN VERIFIED COMPLETE BY:

	Attached* Yes	No
a) Document(s) # *ccMail*	[X]	[ ]

b) Describe *See attached*

4. DATE(s) COMPLETE: *09/19/94*

5. AUTHORIZING SIGNATURE:

The undersigned have verified that the above action(s) have been completed as described. This complete form is subject to QA Audit and SHALL be filed with the SPR file.

_____ / _____
Department Manager (Required) Date

RECEIVED
SEP 19 1994
CORRECTIVE ACTION DESK

* VERIFICATION DOCUMENTS SHALL BE PROVIDED FOR NRC RELATED ISSUES

Author: William M Dowdy at FS2-2-STP-HLP
Date: 9/19/94 12:04 PM
Priority: Normal
TO: John R Lovell
TO: Ron L Gibbs
Subject: Re: security breaches
---------- Message Contents ----------

close it out, I can think of no other places or penetrations that would require Security.

---------- Reply Separator ----------
Subject: security breaches
Author: Ron L Gibbs at FS2-2-STP-HLP
Date: 9/19/94 10:59 AM

I sent this message to all SS's and received no response back. Based on that, I assume no other things need identified. I am going to close this action out.

---------- Forward Header ----------
Subject: security breaches
Author: Ron L Gibbs at FS2-2-STP-HLP
Date: 9/7/94 7:14 AM

SPR 940777 identified that numerous entries had been made into the AFWST valve pit without the control room being notified, thus the required valve lineup was not performed. A corrective action from this SPR was for Operations to identify other similar breaches where security should contact control room prior to opening the breach. Labels are to be placed on these and security will make necessary changes to ensure the control room is contacted prior to opening these.

Already identified are:

AFWST valve pits
ECW roof plugs
FHB doors

If you can think of any others, please respond back.

Author: Ron L Gibbs at FS2-2-STP-HLP
Date: 9/19/94 11:06 AM
Priority: Normal
TO: John H Tedens
Subject: security breaches
---------- Message Contents ----------

John,

Corrective action C3 of SPR 940777 requires POD to attach information labels to barriers to contact the control room prior to breaching. I have asked all the SS's if there were any other areas that needed to be identified. Based on no response, I assume there were no others than what is on the below list. I think all but the AFWST valve pits are labeled.

---------- Forward Header ----------
Subject: security breaches
Author: Ron L Gibbs at FS2-2-STP-HLP
Date: 9/19/94 10:59 AM

I sent this message to all SS's and received no response back. Based on that, I assume no other things need identified. I am going to close this action out.

---------- Forward Header ----------
Subject: security breaches
Author: Ron L Gibbs at FS2-2-STP-HLP
Date: 9/7/94 7:14 AM

SPR 940777 identified that numerous entries had been made into the AFWST valve pit without the control room being notified, thus the required valve lineup was not performed. A corrective action from this SPR was for Operations to identify other similar breaches where security should contact control room prior to opening the breach. Labels are to be placed on these and security will make necessary changes to ensure the control room is contacted prior to opening these.

Already identified are:

AFWST valve pits
ECW roof plugs
FHB doors

If you can think of any others, please respond back.

POD 94100911
Trax #1810

SPR ACTION COMPLETION VERIFICATION FORM

1. SPR#: SPR 940777   Action Item # (if known): C3

2. ACTION #(s) STATEMENT(s) *Attach information labels to barriers identifying requirements.*

3. THE ABOVE ACTION HAS BEEN VERIFIED COMPLETE BY:

	Attached* Yes	No
a) Document(s) # *Speedimemo*	[X]	[ ]

b) Describe *See attached*

4. DATE(s) COMPLETE: *10/03/94*

5. AUTHORIZING SIGNATURE:

The undersigned have verified that the above action(s) have been completed as described. This complete form is subject to QA Audit and SHALL be filed with the SPR file.

Will S. [signature] for DL Munce / 10.3.94
Department Manager (Required) Date

RECEIVED
OCT 05 1994
CORRECTIVE ACTION GROUP

* VERIFICATION DOCUMENTS SHALL BE PROVIDED FOR NRC RELATED ISSUES

STP. 67 (05/90)

SPEEDIMEMO

HOUSTON LIGHTING & POWER CO.

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION

P. O. BOX 289, WADSWORTH, TEXAS 77483

TO Amy McLAMB	AT NSC 2127
SUBJECT SPR Closure	DATE 10/3/94

PLEASE CLOSE SPR's 941296 & 940777 AS THE REQUIRED ACTIONS HAVE ~~BEEN~~ TAKEN

PLEASE REPLY TO **SIGNED** John A Lo... X 7481

SPR 940777 C3 and SPR 941296 C1 These corrective actions ~~were~~ closed in the ops data base & have been forwarded to CAG for closure.

DATE 10-3-94	SIGNED Amy L McLamb

SEND PARTS 1 AND 2 INTACT.
PART 2 WILL BE RETURNED WITH REPLY

ADDENDUM 4
TYPICAL SPR ACTION COMPLETION VERIFICATION FORM
(Page 1 of 1)

1. SPR#: 940777 Action Item # (If Known): C5
NRC Related [ ] Yes [X] No

2. ACTION #(s) STATEMENT(s) Nuclear Security will revise the APPLICABLE SECTIONS OF ACCESS CONTROL PROCEDURE "OSDP02-ZS-0027" (OSDP02-ZS-0039) to incorporate requirements to NOTIFY Operations Shift/Unit SUPERVISORS prior to the opening or closing of to BE "identified" site barriers, doors and locks that can effect system COMPONENTS or plant operability.

3. THE ABOVE ACTION HAS BEEN VERIFIED COMPLETE BY:

		Attached* Yes	No
a) Document(s) #	OSDP02-ZS-0039, REV. 1	[ ]	[X]
#		[ ]	[ ]
#		[ ]	[ ]
#		[ ]	[ ]
#		[ ]	[ ]

b) Describe REVISION 1 to OSDP02-ZS-0039 WAS APPROVED ON 10/13/94, and EFFECTIVE ON 10/20/94.

4. DATE(s) COMPLETE: 10/13/94

AUTHORIZING SIGNATURE: [signature] / 10/17/94
Date

* VERIFICATION DOCUMENTS SHALL BE PROVIDED FOR NRC RELATED ISSUES

STP 3496.WP (01/94)

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION EQUIPMENT CLEARANCE ORDER	SYSTEM	PAGE	UNIT	YEAR	ECO NUMBER
	LO	1	1	94	40873

WHAT IS BEING TAGGED	WHEN HUNG, CONTACT SHORTY
9E301ELP0404 LIGHTING PANEL LP 15B CKT 10	6500
FOR WHAT REASON REPLACE FIXTURE	WHO PREPARED THIS ECO? JOHN COLLINS

WORK DOCUMENT (WAN ?)	CRAFT	ACCEPTOR (PRINT/SIGN/PHONE/PAAS BADGE/DATE/TIME)	RELEASED BY DATE/TIME
170195 AFW STORAGE TANK PIT BAY	EM	EXT. 4500 3013 3-22-94 J.L. LANDRUM J.L. Landrum 07:37	J.L. Landrum 3-22-94 10:05
		OTL 1-93-479	Reload 2/5/94

OTL INFORMATION	IS INDEP VERIF REQUIRED	APPROVAL TO HANG ALL TAGS	APPROVAL TO REMOVE ALL TAGS
1/7	NO	3.21.94 0743 DATE/TIME	3-22-94/1007 DATE/TIME

LINE ITEM	BDRY	COMPONENT TAGGED OR INSTRUCTION for test tags, include craft/work document also	SINGLE TAG ADDITION DATE/TIME	SEQ	CLEARANCE POSITION	TAG HUNG BY IV	SINGLE TAG REMOVAL DATE/TIME	SEQ	RESTORATION POSITION	REMOVED BY IV
D1		LP15B CKT 10 (29FT TGB, NEAR EAST ENTRANCE)		1	OFF				ON	
		STI-94-004053-40								

10/94 10:14:40
Events

THIS FORM, WHEN COMPLETE, SHALL BE RETAINED FOR A MINIMUM OF 5 YEARS.

RMS File 210.03

X mitt. 0 to 3/22/94
V. 12

UNIT 1

013 (01/93) | STAPLE TAG HERE

SR # 170195

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION

SERVICE REQUEST

WAN # 9301418

SECTION I PROBLEM IDENTIFICATION

INPRDS DISCOVERY CODES
DESCRIPTION CODES
STATUS G
SYMPTOM A
DETECTION J

TAG ATTACHED ☐ YES LOCATION _____ ☑ NO _____

UNIT 0 ☐ 1 ☑ 2 ☐

ITEM DESC Light Fixture

LOCATION Aux Feedwater Storage Tank

SYS	BLDG	ELEV	ROOM	COMPLETE TAG/TPNS NO.
LG		32'	BAYC	LG SYSTEM

INFORMATION SR ☐ YES ☑ NO

QUALITY RELATED ☐ YES ☑ NO

PROBLEM DESCRIPTION/WORK REQUESTED Light Fixture in BAY C (N.E. compartment) of Aux Feedwater storage tank needs to be replaced. Access to BAY C is AFST Door # 100C

REFERENCE DOCUMENTS Fixture is A Crouse Hinds Cat # EBC X202 M2

L. M. HAGAMAN | 18303 | 103-24-93 | 1430 | Elec. Maint.
ORIGINATOR (PRINT) | EXT. | DATE | TIME | DIVISION

SECTION II EVALUATION ISSUING AUTHORITY GROUP

SPR INITIATED ☐ YES ☒ NO

COND REL REQUIRED ☐ YES ☒ NO

LCO ☐ YES ☒ NO

TECH SPEC EQUIP ☐ YES ☒ NO

TECH SPEC SECTIONS

	YES	NO
MCB	☐	☒
IAFO	☐	☒
CHM	☐	☒
IAFT	☐	☒

STEAM LEAK ☐ YES ☒ NO

PRI 4 ☐ A ☒ B

COMMENTS REQUIRES SECURITY SUPPORT TO OPEN
PIT

SIGNATURE 3-24-93 DATE • PRI ☐ 1 ☐ 2 ☐ 3A ☐ 3B ☐ 3C

MILESTONE 90 • REQUIRES SHIFT SUPV. SIGNATURE _____ DATE _____ TIME

MODE ANY

WORK START AUTHORITY

☐ HP ☐ FACILITIES MANAGEMENT ☐ CHEM OPS ☐ CHEM ANALYSIS ☐ MAINT ☐ IR ☐ SECURITY ☒ OPS ☐ DED

SECTION III PLANNING EVALUATION/MINOR WORK

VOID ☐ MINOR MAINTENANCE ☑ WORK ORDER ☐

WORK ORGANIZATION EM

ASSIGNED OWNER LYNN DAVIDSON 6-23-93 6-23-93 6-23-93

OWNER/ENGINEER COMMENTS INSTALL NEW LIGHT FIXTURE. 6-23-93

☐ USE-AS-IS ☐ 50.59 CONSIDERED PCF ATTACHED ☐ YES ☐ NO

ENGINEER SIGNATURE DATE TIME ☐ WORK START AUTHORITY _____ NAME INFORMED

NOTIFICATION OF START: WSA NAME DATE TIME

CLOSEOUT: CRAFTSMAN SIGNATURE DATE TIME

NOTIFICATION OF COMPLETION: WSA NAME DATE TIME

TOTAL MEN _____ TOTAL MANHOURS _____

COMPLETED SR FOR QUALITY-RELATED ITEMS SHALL BE RETAINED FOR LIFE OF PLANT.
COMPLETED SR FOR NON QUALITY-RELATED ITEMS SHALL BE RETAINED FOR FIVE YEAR.
COMPLETED SR FOR INFORMATION ONLY RETENTION NOT REQUIRED. UNLESS PHYSICAL WORK PERFORMED.

DOCUMENT LG-1-170195

The following format shall be used to document the Self Verification Steps in every work package in both the pre-job briefing and actual work performance.

1. Self-Checking
   A. A work practice that is consciously and deliberately used by a worker in response to cues that indicate heightened risk is present to ensure the correct action is applied to the correct component.
   B. Results:
      1. Improved human performance
      2. Fewer personnel errors
      3. Fewer injuries
      4. More-proficient utilization & operation of equip.

In-Field Verification

	NAME	CRAFT / DATE
1.	J.L. LANDRUM	6 12-8-93
2.	J.C SMITH	6 12-8-93
3.	J.D. RILEY	6 12-10-93
4.	F.G. TOLAR	6 12-10-93
5.		

STEPS (INITIAL AND DATE APPROPRIATE BLOCK AFTER YOUR VERIFICATION.)

I. STOP - THIS IS THE MOST IMPORTANT STEP; JUST PERFORMING THIS HELPS TO ASSURE THAT AN ERROR WON'T BE MADE

a. Do you have the correct work package?
b. Verify the tag numbers.
   1. Are you in the correct Unit?
   2. Are you in the correct train?
   3. Are you at the correct component?
c. Do you have all of the permits/clearances needed?
d. Do you have the right tools, materials, and equipment?
e. Are you wearing proper safety protection equipment (eye / ear/ etc.)?
f. Are you certified to do the job? If not, is someone on the crew certified?

1.	2.	3.	4.	5.
12-8-93	12-8-93	12-10-93	FGT 12-10-93	/

II. THINK - FOCUS ON THE TASK AT HAND; THINK ABOUT THE ACTION YOU ARE ABOUT TO TAKE AND CONSIDER THE EXPECTED RESULTS.

a. Do you fully understand the task? Are the work package instructions clear?
b. Have you ensured the component is ready for you to work on? For example, are you working on the component that was deenergized or the pipe that was drained?
c. What do you expect to happen as a result of your actions? What are you going to do if something else happens?

1.	2.	3.	4.	5.
12-8-93	12-8-93	12-10-93	FGT 12-10-93	/

III. ACT - ENSURE THAT YOU ARE ON THE COMPONENT THAT YOU INTEND TO MANIPULATE.

a. DO NOT ACT HASTILY.
b. Ensure distractions are eliminated or minimized.
c. Be prepared for the unexpected.

1.	2.	3.	4.	5.
12-8-93	12-8-93	12-10-93	FGT 12-10-93	/

IV. REVIEW - DID YOU GET THE EXPECTED RESULTS?

a. Do not act hastily if the wrong response occured. Notify the control room and your supervisor if needed.
b. Review the task performance for completeness and correctness.
c. Inform your supervisor of the results.

1.	2.	3.	4.	5.
12-8-93	12-8-93	12-10-93	FGT 12-11-93	/

Initial Date Initial Date Initial Date Initial Date

Priority [4B]	WORK ORDER SECTION I	SR # LG-1-170195 WAN # 93011418

TAG/TPNS #: LGSYSTEM
Component Desc.: NORMAL AC LIGHTING SYSTEM
Bldg: TGB
Room: BAY C
Elevation: 32
UNIT: 1

Lead Work Group: EM
Support Groups:
Area/Other: AUX FEEDWATER STORAGE TANK

Problem Description:
LIGHT FIXTURE IN BAY C (N.E. COMPARTMENT) OF AUX FEEDWATER STORAGE TANK NEEDS TO BE REPLACED. ACCESS TO BAY C IS AFST DOOR #100C.

SECTION II

Quality Related:	N	Environment Qualified:	N
NPRDS:	N	ASME Class:	
QA/QC Engr.:		ASME Sec XI Trvl Req:	[YES] [NO] (circled NO)
Seismic II/I:	N	PMT Required:	N

	WORK PACKAGE APPROVAL		REV 1 APPROVAL		REV 2 APPROVAL	
	Signature	Date	Signature	Date	Signature	Date
Planner	Robert H. [signature]	8/5/93				
Owner	Lynn Davidson	8/5/93				
Cog Engr	NA					
RMA	N/A					
OQC	NA					
ITR	NA					

REV 1 Description	REV 2 Description
PMT AFFECTED [YES] [NO]	PMT AFFECTED [YES] [NO]

OOS#: 1-93-479 [stamp: OOS 1-93-479 / OT# — struck] ESD 2-3-94 Cleared: [initials] Date

WORK START AUTHORITY: Reactor Operations

Time when component must be returned to service		
2-3-94 Mode 3 restart	Rev 0 [signature]	12/14/93
Time / Date	Rev 1	
	Rev 2	
	Signature	Date

WORK COMPLETION APPROVAL:					
SR Tag removed:	[YES]	[NO] (circled)	[N/A]	could not find one 3-23-94	
Clearance / Permits Released:	[YES] (circled)	[NO]	[N/A]		TP #:
PMT Completed:	[YES] (circled)	[NO]	[N/A]		

	Signature	Date
WORK SUPERVISOR:	[signature]	3-23-94
COG ENGR/MAINT ENGR.:		
WORK START AUTHORITY:	[signature]	3-30-94
REVIEW COMPLETE (RMRG):		
PLANNER (OPTIONAL):		

RETENTION: QUALITY RELATED - LIFE OF PLANT, NONQUALITY - 1 YEAR

SR # LG-1-170195

PERMITS / DOCUMENTATION

WAN # 93011418

HOUSEKEEPING ZONE	IV	
CLEANLINESS CLASS	C	
EFFECT CHARCOAL FILTER	N	
CONFINED SPACE	Y	PERMIT NO.: 04527¢
FIRE HAZARD EVAL.	N	PERMIT NO.: NA
IMPAIRMENT FORM	[YES] / [NO] (circled)	
HOT WORK PERMIT	N	PERMIT NO.: NA
ADDITIONAL SECURITY REQ.	Y	PERMIT NO.: 93639
RADIATION WORK PERMIT	N	PERMIT NO.: NA
EQUIPMENT CLEARANCE	2-9-94 ~~N~~ Y	PERMIT NO.: 1-94-40873
SCAFFOLDING PERMIT	N	PERMIT.NO.:
INSULATION PERMIT	N	PERMIT.NO.:

ASSOCIATED DOCUMENTS	M & TE Used Description:	I.D. No.	Cal Due
TORQUE WRENCH	TORQUE WRENCH	100-03129-030	4-28-94
ALARM PORTABLE GAS		200-01290-02	6-19-94

PERSONNEL PERFORMING MAINTENANCE

Name (Print)	Craft	Signature	Hrs Wkd	Date
Jimmie Landrum	6	J. L. Landrum	8	12-10-93
J. D. Riley	6	J D Riley	4	12-10-93
F.G. Tolar	6	[signature]	2	12-10-93
Jimmie Landrum	6	J. L. Landrum	2	12-13-93
Joe Toria	EM	[signature]	7	2-2-94
Jimmie Landrum	6	J. L. Landrum	3	3-18-94
Jimmie Landrum	6	J. L. Landrum	3	3-21-94
Jimmie Landrum	6	J. L. Landrum	6	3-22-94
F. G. Tolar	6	[signature]	6	3-22-94

LOST TIME Y HOURS 4

REASON: SECURITY

OPTIMUM CREW SIZE NEEDED TO DO TASK: 2 41 hrs

06:26:51 05 AUG 1993

SPARE PARTS / MATERIAL USE

SR # LG-1-170195

WAN # 93011418

HL&P P/N	MCCODE	ISN	L/V	QTY REQ	QTY O/H	SPARE PARTS / MAT'L DESC	QTY USED
						********** NO GIR(s) PRINTED AS OF 08/05/93 **********	
201.48101		MAF-T10564		1	1		1

IR NUMBER(S)

CHARGE ACCOUNT

COST CODE

1.0 PREREQUISITES:

1.01 PERFORM PRE-JOB BRIEFING. INITIAL Euem DATE 12-8-93

1.02 IS ANOTHER CRAFT INVOLVED? [✓] YES [XX] NO

** IF YES, [✓] SUPPORT SVCS [ ] MM [ ] I&C [ ] OTHER

REMARKS: CHERRY PICKER & OPERATOR

1.03 IS QC REQUIRED? [ ] YES [✓] NO

STEPS: ______

1.04 WHILE PERFORMING TROUBLESHOOTING ACTIVITIES DEFINED WITHIN THE SCOPE OF THIS WORK PACKAGE, ARE WRITTEN TROUBLESHOOTING INSTRUCTIONS REQUIRED?"

[ ] YES [✓] NO

[signature] / 12/10/93
WORK START AUTHORITY / DATE

2.0 PRECAUTIONS:

2.01 IF DURING THE PERFORMANCE OF THESE WORK INSTRUCTIONS, IT IS DETERMINED THAT THE AS-BUILT CONFIGURATION DOES NOT MATCH DRAWINGS, MANUALS OR OTHER REFERENCES OF THESE WORK INSTRUCTIONS,

******* STOP WORK *******

AND CONTACT THE WORK SUPERVISOR OR GENERAL MAINTENANCE SUPERVISOR FOR ENGINEERING/NONCONFORMANCE EVALUATION.

2.02 POWER SUPPLY: 9E301E1P0404 (LP-15) BKR 10

(BACK-UP) N/A

(SPACE HTR) N/A

3.0 WORK INSTRUCTIONS:

3.01 INTENT/SCOPE

3.01.01 THE INTENT OF REV Ø IS TO REPLACE THE DEFECTIVE LIGHT FIXTURE, THIS COULD BE ACCOMPLISHED IN TWO STEPS: STEP ONE IS TO REMOVE THE COVER FROM THE BAY AND DETERMIN THE TYPE OF FIXTURE (REPLACE IF ONE OF THE TYPE IS FOUND IN THE W/HS) STEP TWO WILL BE USED (IF NONE WAS FOUND IN THE W/HS) TO REPLACE THE FIXTURE WHEN THE REPLACEMENT ARRIVES ON SIGHT. THIS WILL BE PERFORMED AS A SKILL OF THE CRAFT.

3.01.02 THE SCOPE OF REV 0 WORK INSTRUCTIONS WILL BE WITHIN THE FOLLOWING BOUNDARIES:

A) EQUIPMENT TPNS: LGSYSTEM

B) AUX FEEDWATER STORAGE TANK BAY "C"

3.02 PRIOR TO STARTING ANY WORK ACTIVITIES, RECORD THE TAG/TPNS NUMBER, UNIT NUMBER, AND TRAIN/CHANNEL DESIGNATOR FROM THE COMPONENT USING SELF-VERIFICATION TECHNIQUES AND ENSURE THE RECORDED INFORMATION EXACTLY MATCHES THE INFORMATION ON THE WORK ORDER/SCOPE STATMENT.

N/A	/	/	
TAG/TPNS NUMBER	PERFORMED BY	DATE	TIME
1	J. LANDRUM	12-10-93	09:30
UNIT NUMBER	PERFORMED BY	DATE	TIME
C BAY	J. LANDRUM	12-10-93	09:30
TRAIN/CHANNEL	PERFORMED BY	DATE	TIME

3.03 UTILIZING "SKILL OF THE CRAFT", PERFORM/REWORK/TROUBLESHOOT THE "PROBLEM DESCRIPTION/WORK REQUESTED", SECTION OF THIS SR. (THE STEEL COVER TO C BAY REQUIRES TO BE TORQUED)

J. LANDRUM / 12-13-93
PERFORMED BY / DATE

3.04 RECORD ALL ACTIONS TAKEN AND WORK PERFORMED IN THE "SUMMARY OF WORK PERFORMED" SECTION OF THIS SR.

4.0 REFERENCES:

4.01 REQUIRED DRAWINGS/PROCEDURES

NOTE WORK PERFORMANCE REQUIRES REVISION VERIFICATION

4.01.01	0PGP03-ZM-0021	R.4	(CONFIGURATION CONTROL)
4.01.02	~~9-E-5000-21~~ 9E-5002-1	R.2 dd 12/05/93	(LTG & COM. DIAGRAM)
4.01.03	0-E-3001 SH. 1	R.~~22~~ 24	(LTG SCHEDULE)
4.01.04	9-E-3206 #1	R.~~22~~ 24	(PANEL SCHEDULE)
4.01.05	0PMP02-ZG-0004	R.3	(TORQUEING PRO)

4.02 PLANNING REFERENCES

4.02.01	PLANNER'S GUIDE		
4.02.02	0PGP03-ZA-0090	R 6	(WORK PROCESS PROGRAM)
4.02.03	0PGP03-ZA-0098	R 0	(STATION HOUSEKEEPING)
4.02.04	0PGP03-ZM-0006	R 5	(SYSTEM CLEANLINESS)
4.02.05	0PMP01-ZA-0040	R 2	(MAINT. WORK PRACTICES)
4.02.06	0PGP03-ZG-0001	R 7	(MATERIAL CONTROL)
4.02.07	0PGP03-ZO-0039	R 4	(CONFIGURATION MGMT.)

SUMMARY OF WORK PERFORMED

SR # LG-1-170195

WAN # 93011418

AS FOUND CONDITION: FIXTURE IN "C" BAY OF UNIT 1 AUX. FEED WATER TANK STORAGE HAD DAMAGED LIGHT FIXTURE.

FAILURE DESCRIPTION: BASE FOR LIGHT BULB CORODED & BROKEN.

CAUSE OF FAILURE: Humidity & CORODED Light BASE FOR LAMP.

SUMMARY OF WORK PERFORMED: Got WORK START Authority FROM UNIT ONE CONTROL ROOM. Got SECURITY BREACH PERMIT FROM SECURITY OFFITE AT EAST GATE. CALLED FOR CHERRY PICKER TO REMOVE COVER PLATE FROM "C" BAY ROOM OF AUX. FEED WATER STORAGE TANK. HAD MADE APPOINTMENT WITH SECURITY TO MAKE THE BREACH AT 09:00. LOOSENED & REMOVED NUTS & WESHERS FROM BOLTS & WAITED FOR SECURITY TO UNLOCK LOCKS. THEY (SECURITY) WAS CONTACTED AT LEAST (3) THREE TIMES & FINALLY ARRIVED AT THE SCENE OF WORK AT 10:30 TO UNLOCK LOCKS TO "C" BAY COVER PLATE. COVER WAS REMOVED AND INSPECTION OF LIGHT FIXTURE TO BE REPLACED WAS MADE. THE LIGHT FIXTURE THAT HAD BEEN ORDERED WAS NOT THE SEME AS EXISTING FIXTURE. EXTENSIVE SEARCH WAS MADE TO LOCATE A REPLACEMENT FIXTURE. NONE WAS FUND. OLD FIXTURE WAS REMOVED AND CARRIED TO OFFITE FOR ORDER INFORMATION. ENTIRE COVER WAS REPLACED, LOCKED & RIGED DOWN UNTIL A REPLACEMENT FIXTURE COULD BE FOUND. SECURITY THEN CHECKED AREA & LEFT. 12-10-93 J.S.F.

RECEIVED PKG. WENT TO RECORDS + GOT NEW DWG ON LOCATION + STYLE. GOT UP WITH PLANNER AND LOOKED MOST OF THE NIGHT FOR A FIXTURE NOT LISTED IN HIS COMPUTER OR FILE. RETURNED TO FOREMAN WITH SUGGESION TO SEND PKG TO SPARE PARTS ENG. JS 2-2-94

UMMARY OF WORK PERFORMED

LG-1-170195

AN # 93011418

AS FOUND CONDITION: N/A

FAILURE DESCRIPTION: N/A

NPRDS FAILING: N/A

CORRECTIVE ACTION: REPLACED FIXTURE TYPE B10/300 AT 200W PART BID # 540-00112 AFTER CALLING CHERRY PICKER OPERATOR & SECURITY TO GET C-BAY COVER REMOVED & REPLACED. WORK WENT SMOOTHLY & WAS COMPLETED IN TOTAL OF 2½ HRS. 3-22-94 J.T.L.

area clean, cover restored, Tool returned to MTE Qu Mueller 3-23-94

	SUMMARY OF WORK PERFORME	SR # LG-1-170195 WAN # 93011418

AS LEFT CONDITIONS: AREA WAS CLEANED UP (10) ½" MOUNTING BOLTS FOR THE COVER PLATE WAS TORQUED TO 55 FT/LBS & THE PLATE EDGES & BOLTS WERE SEALED WITH DOW CORNING 732 RTV SEALANT. 12-13-93 J.T.

AREA WAS CLEANED & (10) ½" STUD BOLTS WERE TORQUED TO 55 FT LBS ON THE COVER PLATE. BOLTS & PLATE MOUNT FACE EDGES WERE SEALED WITH DOW CORNING RTV SEALANT #732. 3-22-94 J.T.

SECURITY COULD NOT SUPPORT HAD TO CALL OFF WORK FOR TODAY 1400 3-22-94

Cog Sys Engr Contacted [YES] [NO] [N/A] Parts Needed for Root Cause [YES] [NO] [N/A]

Parts Discarded [YES] [NO] [N/A] Parts to be Rebuilt [YES] [NO] [N/A] WR# _____

Area Clean:	[YES]	[N/A]	Insulation Removed:	[YES]	[NO] [N/A]
Tools Removed:	[YES]	[N/A]	Insulation Reinstalled:	[YES]	[NO] [N/A]
Hardware Restored:	[YES]	[N/A]	Scaffolding Removed:	[YES]	[NO] [N/A]

WORK COMPLETED: J. LANDRUM 12-13-93 12-13-93 14:00
Craftsman Date Time

J. LANDRUM 3-22-94 13:20

STP 354 (10-88)

Sou Texas Project Electric Generating (tion

PERMIT TO BREACH SECURITY BARRIER

ONLY ONE BARRIER MAY BE ADDRESS BY EACH PERMIT.

1 Permit # 93039

2 Work Control Document(s) 170195

3 Location of Barrier (Be Specific) AFST DOOR # 100C

4 Penetration/Door/Damper #'s AFST DOOR #100C

☐ New Penetration(s)

5 Design Details 9E 50021

Drawing Affected

6 Estimated Beginning of Breach 12/16/93 (Date) 08:00 (Time)

7 Estimated Duration of Breach (In Hours)

8 Estimated Completion/Securing of Breach / / (Date) (Time)

SIGNATURES

APPROVED: (Security Force Supervisor) 12/10/93 (Date) 0809 (Time)

BARRIER BREACHED / / (Date) (Time) (Foreman or Supervisor)

BARRIER RESTORED / / (Date) (Time) (Foreman or Supervisor)

RESTORATION VERIFIED BY (Security Force Supervisor/Lieutenant/ESS Lead Analyst) / / (Date) (Time)

THIS FORM, WHEN COMPLETED, SHALL BE RETAINED WITH THE APPLICABLE WORK CONTROL DOCUMENT PACKAGE.

Cully

Rev. 1
April 16, 1993

PORC Review Evaluation

SPR 940777

Subject _____

_____

_____

_____

Does the subject SPR meet any of the following criteria:

		YES	NO
1)	Concerns a REPORTABLE EVENT?	___	✓
2)	Concerns a significant operating abnormality or significant deviation from normal and expected performance of plant equipment or systems that affect nuclear safety?	___	✓
3)	Concerns unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety?	___	✓
4) *	Concerns any accidental, unplanned, or uncontrolled radioactive release?	___	✓
5)	Concerns the violation of: • Codes • Regulations • Orders • Technical Specifications • Operating Licensing Requirements having nuclear safety significance?	___	✓
6)	Concern the abnormal degradation of systems designed to contain radioactive material?	___	✓

If any of the above questions are answered YES, THEN the subject SPR SHALL be submitted to PORC.

C Bandurraga
Evaluator

2/21/94
Date

* An SPR that concerns uncontrolled radioactive release requires review and approval by the Plant Manager.