



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 27, 1994

Docket Nos. 50-498
and 50-499

Mr. William T. Cottle
Group Vice President, Nuclear
Houston Lighting & Power Company
South Texas Project Electric
Generating Station
Post Office Box 289
Wadsworth, Texas 77482

Dear Mr. Cottle:

SUBJECT: SIGNIFICANT FINDINGS FROM THE OPERATIONAL READINESS ASSESSMENT TEAM
INSPECTION

During the period from December 6-10, 1993, and January 12-21, 1994, an Operational Readiness Assessment Team (ORAT) inspection, led by the Special Inspection Branch of the Office of Nuclear Reactor Regulation, was conducted at the South Texas Project (STP). The purpose of this inspection was to provide an independent assessment of Houston Lighting and Power's readiness to restart Unit One of the South Texas Project. The purpose of this letter in advance of the inspection report is to document the three issues identified by the ORAT team for which you have agreed to take additional actions prior to restart. The three issues concern:

- 1) weaknesses in your programs for ensuring configuration management which resulted in numerous unexpected equipment actuations and clearance order deficiencies over the last several months;
- 2) control of the manual operation of motor-operated valves which are not self-locking and can unexpectedly change position if operated manually and then not electrically re-engaged; and
- 3) failure to demonstrate operability of the pressurizer power operated relief valves from the main control panel by testing these valves only from the auxiliary shutdown panel.

During the exit meeting on January 21, at the conclusion of the inspection, you agreed to take the specific actions in Enclosures 1 and 2 of this letter. Resolution of these issues will be confirmed by Region IV. Pending the results of your actions concerning the above three items, the ORAT team would generally be supportive of a restart of Unit One.

NRC FILE CENTER COPY

010104

9402030240 940127
ADOCK 05000498

D/13
DFX 2
111

HOUSTON LIGHTING AND POWER COMPANY ORAT RESTART ACTION ITEMS

1. HL&P will establish and implement a configuration management action plan to identify and implement corrective actions to prevent configuration management deviations during the upcoming unit startup, power ascension, and subsequent operation. See attached Action Plan (Enclosure 2).
2. HL&P will implement corrective actions to ensure that motor operated valves do not open as a result of system pressure
3. HL&P will assess whether surveillance weaknesses similar to the failure to conduct PORV testing from the main control board exist for other valves. Any similar weaknesses will be resolved prior to Mode 4.

January 20, 1994

CONFIGURATION MANAGEMENT ACTION PLAN

OBJECTIVE: Identify and implement corrective actions to prevent configuration management deviations during the upcoming unit startup, power ascension, and subsequent operation.

ACTIONS:

A. Events

1. Review each of the 33 previously identified 1993 events and validate the causal factors.
2. Ensure that adequate corrective actions have been implemented or are identified for each of these SPRs.
3. Perform a Symptom Classification Technique (SCT) review of these SPRs based on the validated causal factors.
4. Identify process improvements or other corrective actions based on the results of the SCT.
5. Conduct an independent industry review of the actions described in Items 1-4 above.
6. Implement those corrective actions which are required prior to startup (Mode 2).
7. Develop a plan to implement and track other long-term corrective actions.

B. Configuration Management Deviations Other than Events

1. Review the 1993 SPR data base for adverse configuration management trends other than those identified in Item A. above.

2. Identify selected SPRs based on these trends and validate the causal factors.
3. Evaluate the adequacy of the corrective actions for each of the selected SPRs based on the validated causal factors.
4. Perform a Symptom Classification Technique review of the causal factors of these SPRs.
5. Identify process improvements or other corrective actions based on the results of the SCT.
6. Conduct an independent industry review of the actions described in Items 1-5 above.
7. Implement those corrective actions which are required prior to startup (Mode 2).
8. Develop a plan to implement and track other long-term corrective actions