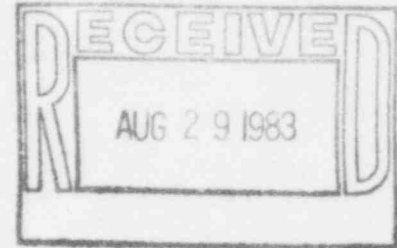


The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

August 24, 1983
ST-HL-AE-998
File Number: G2.4/C10.1.1

Mr. John T. Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012



Dear Mr. Collins:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation

Pursuant to the provisions of 10CFR2.201 enclosed is Houston Lighting & Power Company's response to the Notice of Violation 50-498/83-11-01 dated July 25, 1983.

If you should have any questions regarding this matter, please contact Mr. Michael E. Powell at (713) 877-3281.

Very truly yours,

A handwritten signature in cursive script that reads "G. W. Oprea, Jr." followed by a flourish.

G. W. Oprea, Jr.
Executive Vice President

LJK/mg
Attachment

IE01

Houston Lighting & Power Company

cc: G. W. Oprea, Jr.
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J. G. Dewease
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S. M. Dew
J. T. Collins
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W. M. Hill, Jr.
M. D. Schwarz
R. Gordon Gooch
J. R. Newman
STP RMS

(NRC)
(NRC)
(NRC)
(Baker & Botts)
(Baker & Botts)
(Lowenstein, Newman, Reis, & Axelrad)

Director, Office of Inspection & Enforcement
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Washington, D. C. 20555

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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

August 24, 1983
ST-HL-AE-998
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C10.1.1
Page 2

Revision Date 07-05-83

South Texas Project
Units 1 & 2
Response to Notice of Violation

I. STATEMENT OF APPARENT VIOLATION

Criterion V to Appendix B of 10 CFR Part 50, states, "Activities affecting quality shall be prescribed by documented instruction, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings."

Contrary to the above, Specification for Concrete Construction 2A010CS0028 and Construction Procedure CSP-4 Concrete Placement do not adequately address the placing of concrete on a sloping surface or the free-form method. On June 3, 1983, Concrete Placement 1-RC-W-210-013/CSI-R10 was placed by the free-form method and the craft (finishers, vibrators) involved had insufficient experience and no apparent instruction prior to this placement and type method used.

II. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

- 1) Nonconformance report (NCR) #CC-00565 was generated in accordance with Ebasco's Quality Program to ensure proper engineering evaluation of the subject placement. Engineering evaluation resulted in cosmetic repairs to the concrete surface with the exception of one (1) structural repair. All the repair work has been completed.
- 2) Specification 2A010CS0028 Rev. 1 has been reviewed and it was determined that the specification adequately addressed the placing and finishing of concrete on a sloping surface.
- 3) Construction procedure CSP-4, Concrete Placement, Rev. 1, was clarified by issuing an interim change prior to the next placement (#1-RC-W-214-015/1-RC-W-218-017) on the Unit 1 dome. Clarification to CSP-4 included provisions for a documented coordination meeting prior to placing free-formed concrete with appropriate personnel from Quality Control, Engineering and Construction. The placement on June 30, 1983 was successfully completed.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The Unit 1 dome was satisfactorily completed using the aforementioned methods. Future free-form placements on steeply inclined surfaces will be performed in accordance with approved procedures that provide appropriate controls.

IV. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All appropriate concrete placement controls for free-form work were established and implemented by June 30, 1983.