The Light company
Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Unit 1
Docket No. STN 50-498
Replies to Notices of Violation 9435-01 and -02
Regarding Nonconservative Test Current Acceptance Criteria
and Inappropriate Surveillance Testing

Houston Lighting & Power has reviewed Notices of Violation 9435-01 and 9435-02, dated January 24, 1995, and submits the attached replies. It should be noted that information on the first violation was submitted to the NRC as Licensee Event Report 1-94-020 on January 9, 1995, but is also included in Attachment 1 to this letter.

If there are any questions regarding these replies, please contact Mr. Ed Halpin at (512) 972-7849 or me at (512) 972-8787.

T. H. Cloninger
Vice President,
Nuclear Engineering

JTC/lf

Attachments: 1. Reply to Notice of Violation 9435-01
2. Reply to Notice of Violation 9435-02

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c:

Leonard J. Callan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8084

Thomas W. Alexion
Project Manager
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001 13H15

David P. Loveless
Sr. Resident Inspector
c/o U. S. Nuclear Regulatory Comm.
P. O. Box 910
Bay City, TX 77404-0910

J. R. Newman, Esquire
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

K. J. Fiedler/M. T. Hardt
City Public Service
P. O. Box 1771
San Antonio, TX 78296

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

G. E. Vaughn/C. A. Johnson
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61067
Houston, TX 77208

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

U. S. Nuclear Regulatory Comm.
Attn: Document Control Desk
Washington, D. C. 20555-0001

J. R. Egan, Esquire
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, D.C. 20037

REPLY TO NOTICE OF VIOLATION 9435-01

I. Statement of Violation:

Technical Specification 4.8.4.1.a.2 requires functional testing of any instantaneous trip element of molded-case circuit breakers (MCCBs) by injecting a test current within a certain tolerance of the element pickup value and verifying that the circuit breakers trip instantaneously with no apparent time delay.

Contrary to the above, as of December 9, 1994, South Texas Procedure 1PSP06-NZ-0006 did not specify the use of a test current within the required tolerance of the trip setting for adjustable MCCBs. For surveillance testing of MCCBs with adjustable instantaneous trip settings, the procedure established the current based on the minimum and maximum possible setting of the MCCB irrespective of the actual setpoint of the breaker. This resulted in nonconservative test current acceptance criteria for detecting changes in MCCB performance.

This is a Severity Level IV violation (Supplement 1) (498/9435-01).

II. Houston Lighting & Power Position:

Houston Lighting & Power concurs that the violation occurred.

III. Reason for the Violation:

The cause of the violation was misinterpretation of the acceptance criteria requirement.

IV. Corrective Actions:

The following corrective actions have been taken:

1. A review of the surveillance test packages for potentially impacted breakers was performed on December 9, 1994. This review identified those breakers which did not fall within the acceptance tolerance band. As a result of this review, 34 breakers were determined to be inoperable in Unit 1 and 32 breakers were determined to be inoperable in Unit 2.

2. A formal procedure revision incorporating use of the appropriate acceptance criteria is being processed. In the interim, containment penetration adjustable molded case circuit breaker tests performed are being administratively controlled to ensure that the correct band is used and documented.

3. The 66 breakers in question have been tested against the appropriate acceptance criteria band.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.

VI. Additional Information:

In 1993, the South Texas Project initiated a Surveillance Procedure Enhancement Program, the scope of which currently encompasses approximately eleven hundred Technical Specification surveillance procedures. The program includes the development of a basis document for selected surveillance procedures to ensure that the Technical Specification and Updated Final Safety Analysis Report requirements are clearly identified. The procedures that have been revised to date were selected based on either being complex procedures with the possibility for causing an unwanted transient or had proven to be difficult to use in the past. The lessons learned while enhancing these surveillance procedures are being incorporated into the on-going upgrade process. In 1994 more than two hundred additional procedures were reviewed. Although technical deficiencies were identified, none resulted in a reduction in the margin to safety. At the end of 1994, a review was performed to determine the appropriate scope and schedule for 1995. The enhancement of the remaining surveillance procedures is scheduled to be completed in 1998. A comprehensive self-assessment of the Surveillance Procedure Enhancement Program was completed in January 1995. The recommendations generated by the self-assessment are being evaluated at this time.

REPLY TO NOTICE OF VIOLATION 9435-02

I. Statement of Violation:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part,

"Activities affecting quality shall be prescribed by documented instructions, procedures... of a type appropriate to the circumstances."

Contrary to the above, as of December 7, 1994, surveillance testing of molded case circuit breakers used for containment penetration protection performed under licensee Procedure 1PSP06-NZ-0006 was not appropriate to the circumstances in that it did not require a demonstration of the operability of the breakers in the as-found condition. The procedure exercised the breakers manually prior to trip current testing required by Technical Specification 4.8.4.1.a.2.

This is a Severity Level IV violation (Supplement 1) (498/9435-02).

II. Houston Lighting & Power Position:

Houston Lighting & Power does not agree that the surveillance testing of the molded-case circuit breakers was inappropriate.

The basis for Technical Specification 3/4.8.4 states, in part, that molded case circuit breakers will be tested in accordance with NEMA Standard Publication No. AB 2-1980. NEMA AB 2-1980, Part 3, Section C, states that "prior to the electrical operation tests, the mechanical operation of the circuit breaker should be checked by turning it on and off several times."

In addition, Attachment 1 to NRC Bulletin 88-10 issued on November 22, 1988, describes a test program for molded-case circuit breakers. The bulletin states that "the NRC considers the test program to provide a reasonable assurance of performance requirements and characteristics most important to ensuring reactor safety." Section 2.0 of the test program states that the tests should be performed in the sequence listed, with the mechanical test as Section 2.1 and the electrical tests beginning with Section 2.2. The specific mechanical test states that the circuit breaker "should be operated, reset, and closed a minimum of five times to ensure that the latching surfaces are free of any binding."

It should also be noted that during the performance of these surveillance tests, the breakers are opened to allow tagging out the circuit and then closed prior to the trip testing. Thus, at least one operating cycle of the breaker has to occur prior to the electrical tests.

III. Reason for the Violation:

As noted above, Houston Lighting & Power does not believe that a violation occurred.

IV. Corrective Actions:

No corrective action is necessary.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.