

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 288 Wadsworth, Texas 77483

February 26, 1992  
ST-HL-AE-4010  
File No.: G02.04  
10CFR2.201

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498 and STN 50-499  
Reply to Notice of Violation 9135-02 Regarding Pressurizer  
Spray Valve Controller Attachment As-Built  
Configuration in Nonconformance With Applicable Vendor Drawings

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9135-02 dated January 27, 1992, and submits the attached reply.

HL&P concurs that the cited violation occurred. However, HL&P does not believe that the nonconforming as-built configuration directly contributed to the disengagement of the feedback arm linkage from the pressurizer spray valve controller and subsequent depressurization event which occurred on December 24, 1991. As stated in Licensee Event Report 91-010 for Unit 2 previously submitted on January 30, 1992, the root cause of the event was maintenance personnel error due to not adequately tightening the linkage and not adequately verifying that the linkage had been properly reassembled. (Reference HL&P correspondence ST-HL-AE-3987).

If you should have any questions, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7205.

*William J. Jump*  
William J. Jump  
Manager,  
Nuclear Licensing

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Attachment: Reply to Notice of Violation 9135-02

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A Subsidiary of Houston Industries Incorporated

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South Texas Project Electric Generating Station

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CC:

Regional Administrator, Region IV  
Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

George Dick, Project Manager  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

J. I. Tapia  
Senior Resident Inspector  
c/o U. S. Nuclear Regulatory  
Commission  
P. O. Box 910  
Bay City, TX 77414

J. R. Newman, Esquire  
Newman & Holtzinger, P.C.  
1615 L Street, N.W.  
Washington, DC 20036

D. E. Ward/T. M. Puckett  
Central Power and Light Company  
P. O. Box 2121  
Corpus Christi, TX 78403

J. C. Lanier/M. B. Lee  
City of Austin  
Electric Utility Department  
P.O. Box 1088  
Austin, TX 78767

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

Rufus S. Scott  
Associate General Counsel  
Houston Lighting & Power Company  
P. O. Box 61867  
Houston, TX 77208

INPO  
Records Center  
1100 Circle 75 Parkway  
Atlanta, GA 30339-3064

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

D. K. Lacker  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78756-3189

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I. Statement of Violation:

Failure to Assure Conformance to Procurement Documents

10 CFR Part 50, Appendix B, Criterion II, requires, in part, that the quality assurance program shall provide control over activities affecting the quality of structures, systems, and components, to an extent consistent with their importance to safety.

10 CFR Part 50, Appendix B, Criterion VII, requires, in part, that purchased equipment conform to the procurement documents.

Contrary to the above, on December 24, 1991, Pressurizer Spray Valve (PCV) 655C was found with the valve controller feedback linkage configuration in nonconformance with the procurement documents (design drawings). The nonconforming as-built design directly contributed to a Unit 2 reactor trip and engineered safety features actuation that occurred on December 24, 1991.

This is a Severity Level IV violation. (Supplement I)  
(498;499/9035-02)

II. Houston Lighting & Power Position:

HL&P concurs that the violation occurred.

III. Reason for Violation:

The vendor manual for the pressurizer spray valve contained a drawing depicting a generic controller assembly. The vendor's supplier elected to modify the method of attachment of the feedback linkage however drawings were not provided depicting the as-built configuration. The details of the controller attachment were not verified during initial installation to ensure that the physical characteristics were accurately reflected in the vendor manual (drawing). Additionally, maintenance planning guidelines did not require reference to specific vendor manual pages or drawings which would have provided an opportunity to identify the nonconformance either during planning of the work instructions or during actual work.

HL&P does not believe that the nonconforming as-built configuration directly contributed to the disengagement of the feedback arm linkage from the pressurizer spray valve controller and subsequent depressurization event which occurred on December 24, 1991. Our reasoning for this position is provided in detail in Licensee Event Report 91-010 for Unit 2 previously submitted on January 30, 1992. (Reference HL&P correspondence ST-HL-AE-3987).

IV. Corrective Actions:

1. A nonconformance report was initiated to document the difference between the as-built configuration of the pressurizer spray valve controller attachment and the vendor drawing. The vendor drawing has subsequently been revised.
2. A bulletin was issued to plant personnel describing each individual's responsibility in identifying nonconforming as-built conditions in the field.
3. Training shall be provided through the following programs to reinforce the lessons learned from this event including configuration control:

Licensed Operator training  
Non Licensed Operator training  
Management and Technical Staff Training  
Maintenance I&C, Electrical, Mechanical continuing training

The last scheduled training session will be completed by July 31, 1992.

4. Maintenance planners have been directed, through a Planner's Guide, to include relevant vendor manual pages (or highlight the relevant pages if supplying the entire manual) with work packages and to direct the performer to stop work if the field installation is different and document the deviation as a nonconformance report. Plant procedures will be revised by April 30, 1992, to formally implement this requirement.

5. To verify proper configuration control, Engineering shall inspect the pneumatic valve actuators (with a positioner which uses a feedback linkage) of valves which are safety-related or important to the continued power production of the plant, compare them to the vendor manuals (design documents), and verify the adequacy of the installations. This item will be completed prior to the end of the next refueling outage for each Unit.

V. Date of Full Compliance:

HL&P is in full compliance at this time.