

March 22, 1994

14-TE-1

MEMORANDUM FOR: A. Bill Beach, Director  
 Division of Reactor Projects  
 Region IV

FROM: Eugene V. Imbro, Chief  
 Special Inspection Branch  
 Division of Reactor Inspection  
 and Licensee Performance  
 Office of Nuclear Reactor Regulation

SUBJECT: POTENTIAL ENFORCEMENT ACTIONS FROM THE SOUTH TEXAS PROJECT  
 OPERATIONAL READINESS ASSESSMENT TEAM INSPECTION

Enclosure 1 is a draft Notice of Violation (NOV) resulting from the Operational Readiness Assessment Team Inspection conducted by the Special Inspection Branch at South Texas Project during the period from December 6-10, 1993 and January 12-21, 1994 (Inspection Report 50-498/93-202 and 50-499/93-202). With respect to the draft NOV, the recommended enforcement classification pursuant to 10 CFR Part 2, Appendix C, has been included in the draft.

We also have included a list of proposed open items in Enclosure 2. These items will be followed up as stated in the enclosure.

The draft NOV and open items have been previously discussed with Region IV (Bill Johnson). If you have any questions, please contact Jeffrey Jacobson (301) 504-2977 or Peter Koltay (301) 504-2957.

ORIGINAL SIGNED BY

Eugene V. Imbro, Chief  
 Special Inspection Branch  
 Division of Reactor Inspection  
 and Licensee Performance  
 Office of Nuclear Reactor Regulation

Enclosures: As stated

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DRAFT NOTICE OF VIOLATION

Houston Lighting & Power Company  
South Texas Nuclear Generating Station,  
Units 1 and 2

Docket Nos: 50-498/499  
License Nos: NPF-76 and NPF-80

During an NRC inspection conducted from December 6-10, 1993 and January 10-21, 1994 violations of NRC requirements were identified. In accordance with the General Statement of Policy and Procedures for NRC Enforcement Actions, 10 CFR Part 2, Appendix C, the violations are given below:

1. Criterion XIV, of Appendix B to 10 CFR Part 50 states, in part:  
"Measures shall also be established for indicating the operating status of structures, systems, and components of the nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation."

Criterion XI, of Appendix B to 10 CFR Part 50 states, in part: "Test procedures shall include provisions for assuring that all prerequisites for the given test have been met, that adequate test instrumentation is available and used, and that the test is performed under suitable environmental conditions."

Technical Specifications, South Texas Project, Unit Nos. 1 & 2, "Reactivity Control Systems, Charging Pumps-Shutdown," Surveillance Requirement 4.1.2.3.2, states that during Modes 4,5 and 6 all charging pumps, excluding the one required operable pump shall be demonstrated inoperable at least once per 31 days and that an inoperable pump may be energized for testing provided that the discharge of the pump has been isolated from the RCS by a closed isolation valve.

Contrary to the above, on January 15, 1994, while supplying normal reactor water make-up with the 1B centrifugal charging pump, the 1A centrifugal charging pump was started and was not isolated from the reactor coolant system. Consequently, two centrifugal charging pumps were aligned and supplying flow to the reactor coolant system for approximately 17 minutes before an operator manually de-energized the 1A pump. Upon investigation, it was determined that the 1A discharge bypass valve (CV-MOV-8348) was open even though it had been tagged closed. This valve had been manually closed by the actuator handwheel on December 30, 1993 and then not electrically re-engaged, which defeated the self-locking feature of the valve actuator. Due to the fact that power had been removed from this valve, position indication was lost, and no notice was taken when it apparently opened on January 6, 1994 due to system pressure generated by testing of the seal injection valves. The visual valve position verification performed prior to the test was inadequate to ensure the valve was actually closed.

This is a Severity Level IV violation. (Supplement 1)

2. Criterion V, of Appendix B to 10 CFR Part 50 states, in part:  
"Activities affecting quality shall be prescribed by documented instructions, 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, on January 14, 1994 during performance of procedure OPOPO2-RC-0004, "Operation of Reactor Coolant Pumps," step 6.11, which required operators to check RCP flow indication after starting a reactor coolant pump, was skipped without justification. Upon review, it was determined that the RCP flow instruments were not operable, as the instruments had not been properly taken out of their normalized test configuration.

This is a Severity Level IV violation. (Supplement 1)

## List of Deficiencies

<u>Number</u>	<u>Title</u>	<u>Status</u>	<u>To Be Followed By</u>
93-201-D1	Weaknesses in Controls for Maintaining Configuration Management	Open	Region IV
93-202-D2	Inadequate Controls for Deleting (N/A) Procedural Steps	Closed	
93-202-D3	Inadequate Controls for the Normalization of Instrumentation	Proposed Violation	Region IV
93-202-D4	Improper Operation of Two Centrifugal Charging Pumps (Technical Specification 3.1.2.3)	Proposed Violation	Region IV
93-202-D5	Questionable Technical Specification Interpretations	Open	Region IV
93-202-D6	Weaknesses in Corrective Action Program Implementation	Open	Region IV
93-202-D7	Inadequate Controls for Temporary Equipment Storage	Closed	

## List of Observations

<u>Number</u>	<u>Title</u>	<u>Status</u>	<u>To Be Followed By</u>
93-202-01	Operability Tracking Log Weaknesses	Open	Region IV
93-202-02	Procedure Quality Weaknesses	Open	Region IV
93-202-03	Failure To Stroke PORVs From Main Control Board	Closed	
93-202-04	Cold Overpressure Protection Controls	Closed	
93-202-05	Equipment Failures Challenging Operations	Open	Region IV
93-202-06	Slow Verification of "Immediate Actions" During Alternate Shutdown Drill	Open	Region IV

93-202-07	Latest Revisions to Procedures Not Always Used	Open	Region IV
93-202-08	Weaknesses in Surveillance Testing Procedures	Open	Region IV
93-202-09	Inconsistencies in Performance of 10 CFR 50.59 Screening Process	Open	Region IV