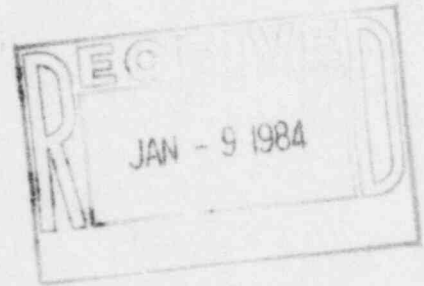


The Light company

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

January 5, 1984
ST-HL-AE-1043
File No.: G3.12/C10.9/D7



Mr. John T. Collins
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Dr., 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 and
Notice of Deviation

Pursuant to the provisions of 10CFR2.201, enclosed is Houston Lighting & Power Company's response to the Notice of Violation 50-498/83-20, 50-499/83-20 and Notice of Deviation 50-498/83-20, 50-499/83-20 dated December 5, 1983.

If you should have any questions concerning this matter, please contact Mr. Michael E. Powell at (713) 993-1328.

Very truly yours,

G. W. Oprea, Jr.

Executive Vice President

MEP/mpg

Attachments: 1) Response to Notice of Violation (83-20)
2) Response to Notice of Deviation (83-20)

cc:

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SOUTH TEXAS PROJECT
RESPONSE TO NOTICE OF VIOLATION
50-498/83-20
50-499/83-20

I. Statement of Apparent Violation

10 CFR Part 50, Appendix B, Criterion XVII states that records shall be identifiable and retrievable and that, consistent with applicable regulatory requirements, the licensee shall establish requirements concerning record retention such as duration, location, and assigned responsibility. Regulatory Guide 1.88 accepts ANSI N45.2.9-1974 with comments as being an adequate basis for complying with Criterion XVII.

Revision 3 of the licensee's STP "Quality Assurance Program Description" (QAPD), Section 17.0, "Quality Assurance Records," requires the establishment of requirements to ensure compliance with 10 CFR 50, Appendix B and ANSI N45.2.9 as endorsed by Regulatory Guide 1.88.

ANSI N45.2.9, Section 6.2, requires accurate retrieval of information without undue delay.

Contrary to the above, the licensee was unable to retrieve for review by the NRC inspector documentation of the licensee training program for South Texas Project site personnel providing instruction in the proper procedure for fabricating and inspecting anchor bolt threads, including the proper use of thread ring gauges and pitch micrometers.

The licensee's "Final Report on the Deficient Threads of Field-Fabricated Anchor Bolts used in Construction of the South Texas Project," dated July 30, 1979, Section IV Recurrence Control, stated that such a training program had been initiated.

The NRC inspector requested retrieval of documentation of this program on July 18, 1983; by September 29, 1983, the licensee had not been able to retrieve any documentation on the training program, a period in excess of 2 months.

II. Reply

To date, no training documentation/records that detail the checking of anchor bolt threads and the use of ring gauges and pitch micrometers have been located. HL&P's response to the Notice of Violation in Inspection Report 83-02 (reference ST-HL-AE-966, dated June 16, 1983), described our program for backfitting previously generated STP records into the current Records Management System (RMS). In that response, HL&P stated that the immediate retrieval of some records generated prior to the transition to Bechtel/Ebasco may not always be possible until the remedial backfit program is completed. This program was formally presented to members of the Region IV staff at a meeting in Arlington, Texas.

As previously described to the NRC Region IV in both oral presentations in Arlington, Texas and in written documentation (reference ST-HL-AE-1022, dated November 3, 1983), the Bechtel Energy Corporation (BEC) Anchor Bolt/Embed Evaluation Program, which is currently in progress, will assure

by combined analyses and testing, that field-fabricated, safety-related anchor bolts and embeds meet project requirements as part of this program. Only Brown & Root (B&R) data supported by proper records will be utilized. Anchor bolt thread test data which would be supported by the missing training documentation/records will not be relied upon by the BEC Anchor Bolt/Embed Evaluation Program unless such records are located. We will include appropriate documentation for use of the B&R data and responses to the NRC concerns as part of the Anchor Bolt/Embed Evaluation Program.

Also, as previously stated in our letter of November 3, 1983 (reference ST-HL-AE-1022) HL&P is committed to ensure that the resolution of issues identified in NRC Inspection and Enforcement Inspection Reports relating to the anchor bolt deficiency are incorporated in the Anchor Bolt/Embed Evaluation Program.

III. Corrective Steps Which Have Been Taken and the Results Achieved

See Section II above.

IV. Corrective Action Which Will be Taken to Avoid Further Violations

See Section II above.

V. Date When Full Compliance Will be Achieved

As stated in our letter of December 1, 1983 (reference ST-HL-AE-1032), the BEC Anchor Bolt/Embed Evaluation Program is scheduled to be completed by the end of the first quarter of 1984.

HL&P's program to systematically backfit construction records created before the transition to Bechtel/Ebasco into the RMS as described in our response to the Notice of Violation in Inspection Report 83-02 is being aggressively pursued. The status of the records backfit program will be provided to the NRC Region IV Resident Inspector quarterly commencing within 30 days.

SOUTH TEXAS PROJECT
RESPONSE TO NOTICE OF DEVIATION
50-498/83-20
50-499/83-20

I. Statement of Apparent Deviation

In the licensee's "Third Interim Report on the Reportable Deficiency Concerning Improper Anchor Bolt Material," dated December 31, 1979, the licensee made the following statement and commitment:

All rod stock material and fabricated anchor bolts have been tested at the job site with exception of pieces that are inaccessible. There are approximately 400 bolts, both safety and nonsafety-related, which are inaccessible at this time due to equipment placement, form work, etc. Testing will be accomplished as each area is made accessible.

In deviation from the above, without notification to NRC, as stated in Brown & Root (B&R) Technical Reference Document (TRD) 5A840SR163-A, Section 4.2.4., B&R decided that testing was not required and did not perform the committed testing.

The NRC inspector has determined that some of the untested anchor bolts may be nonconforming (NRC Inspection Report 50-498/83-02; 50-499/83-02, Section 10.b.(1)).

Bechtel Power Corporation Test 044 discovered nonconformances with some of these bolts not tested by B&R, and the bolts have been replaced (Nonconformance Report EC-00031) (498/8320-02).

II. Reply

The subject B&R TRD provided adequate justification for not testing inaccessible anchor bolts. Our letter dated January 26, 1981 (reference ST-HL-AE-602) provided supplemental information relative to anchor bolt material verification and informed NRC Region IV that a report (the TRD) summarizing the disposition of numerous non-conformances related to anchor bolts was being prepared. This TRD was available for review during NRC inspections on the closure of the anchor bolt deficiency. On August 12, 1983, HL&P, in communications with Region IV, verbally re-opened the anchor bolt deficiency. In addition, HL&P's letter of August 15, 1983 (reference ST-HL-AE-992) committed to submit additional information on the anchor bolt deficiency upon completion of the Bechtel Anchor Bolt/Embed Evaluation Program. Bechtel through the development of Anchor Bolt/Embed Evaluation Program has been charged with ascertaining the adequacy of the material itself and this program will resolve the anchor bolt deficiency independent of commitments made during the tenure of the previous contractor.

On September 19, 1983, Houston Lighting & Power Company (HL&P) met with representatives of Region IV to discuss the Bechtel Energy Corporation (BEC) program to resolve all issues concerning anchor bolts. Safety concerns raised by this Notice of Deviation will be resolved as a part of this program. At that meeting, a commitment was made that all A-193 safety-related anchor bolts would be tested.

If any of the A-193 bolts previously indicated as not having been tested are safety-related, they will be tested by Bechtel. If any safety-related anchor bolts are found to be inaccessible or are found to be nonconforming, proper resolution of these problems will be accomplished as part of the BEC Anchor Bolt/Embed Evaluation Program.

III. Corrective Steps Which Have Been Taken And The Results Achieved

See Section II.

IV. Corrective Action Which Will Be Taken To Avoid Further Violations

See Section II.

V. Date When Full Compliance Will Be Achieved

As stated in our letter of December 1, 1983 (reference ST-HL-AE-1032), the BEC Anchor Bolt/Embed Evaluation Program is scheduled to be completed by the end of the first quarter of 1984.