

JAN 27 1992

Docket Nos. 50-498
50-499
License Nos. NPF-76
NPF-80

Houston Lighting & Power Company
ATTN: Donald P. Hall, Group
Vice President, Nuclear
P.O. Box 1700
Houston, Texas 77251

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-498/91-35; 50-499/91-35 (NOTICE OF VIOLATION)

This refers to the special inspection conducted by Mr. J. I. Tapia of this office during the period December 26, 1991 through January 3, 1992. The inspection included a review of activities authorized for your South Texas Project. At the conclusion of the inspection, the findings were discussed with you and those members of our staff identified in the enclosed report.

The area examined during the inspection included onsite followup of the Unit 2 reactor trip which occurred on December 24, 1991. The inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations of activities in progress.

On the basis of the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation relates to the identification that the as-built condition of the pressurizer spray valve assemblies was different from the previously reviewed and approved, vendor supplied design drawings. The violation is of concern because discrepancies between approved design documents and as-built conditions can adversely affect quality-related components. In this instance, the nonconforming as-built design directly contributed to the occurrence of a reactor trip and engineered safety features actuation. This event also demonstrated a weakness in the area of maintenance implementation. Prior maintenance on these valves provided several opportunities to identify the discrepancy; however, your staff failed to identify the difference between the vendor manual drawing and the field conditions. In our view, the use of references to vendor manuals, as opposed to specific work instructions in the subject service requests, contributed to the circumstances which caused the violation to occur.

In addition, we concluded that operator actions in response to the depressurization event were adequate. However, not all expected plant responses occurred as the result of implementing the off-normal procedure. This is indicative of the need for reevaluating the adequacy of the procedure and for obtaining a thorough understanding of the actual plant hydraulic response to a stuck open spray valve.

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|------------|--------------|---------|
| RIV:SRJ | C. J. R. / w | D:DRP |
| JITapia/lr | AT | ABBeach |
| 1/27/92 | 1/27/92 | 1/27/92 |

JEOL

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. You should also include a description of action taken to ensure that all reactor coolant system hydraulic responses are adequately anticipated and controlled.

In accordance with 10 CFR Part 2.90 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room. The response directed by this letter and enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

A. B. BEACH

A. Bill Beach, Director
Division of Reactor Projects

Enclosures:

Appendix A - Notice of Violation
Appendix B - NRC Inspection Report
50-498/91-35
50-499/91-35 w/attachment

cc w/enclosures:

Houston Lighting & Power Company
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Wadsworth, Texas 77483

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

City Public Service Board
ATTN: R. J. Costello/M. T. Hardt
P.O. Box 1771
San Antonio, Texas 78296

Houston Lighting & Power Company

-3-

Newman & Holtzinger, P. C.
ATTN: Jack R. Newman, Esq.
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Central Power and Light Company
ATTN: D. E. Ward/T. M. Puckett
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State of Texas
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Judge, Matagorda County
Matagorda County Courthouse
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Licensing Representative
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Houston Lighting & Power Company
ATTN: Rufus S. Scott, Associate
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bcc to DMB (1E01)

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