APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company South Texas Project, Units 1 and 2 Docket Nos. 50-498 50-499

Operating License Nos. NPF-76 NPF-80

During an NRC inspection conducted November 16 through December 20, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

Failure to Follow Procedural Requirements

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 8.b(1)(c) of Appendix A requires that containment local leak tests be performed in accordance with specific procedures. This is accomplished, in part, by Procedure OPSP11-PO-0001, Revision 2, "Local Leakage Rate Test Penetration: M-75 RCP Dil Return Line."

Step 6.6.8 of Procedure OPSP11-P0-0001 requires technicians to "Depressurize the piping by opening and closing the test connection (P0-0236)" after obtaining the leakage rate measurements.

Contrary to the above, on November 6, 1991, technicians performing the local leakage rate test on Penetration M-75 did not depressurize the piping after obtaining the leakage rate measurements. On December 4, 1991, during the performance of a service request to lower reactor coolant pump motor lubrication oil, the unvented pressure caused a loss of lubrication to the lower radial bearing of the Reactor Coolant Pump 20 motor. As a result, the bearing had to be replaced.

This is a Severity Level IV violation. (Supplement I) (499/9130-01)

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the subject facility of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps which have been taken and results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified,

suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas, this 29th day of January 1992