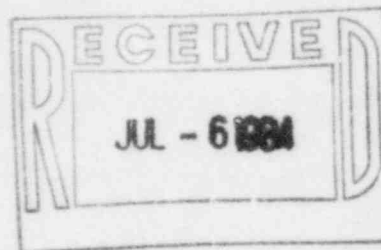


# The Light company

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

July 2, 1984  
ST-HL-AE-1106  
File No: G2.4/D7.8



Mr. John T. Collins  
Regional Administrator, Region IV  
Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

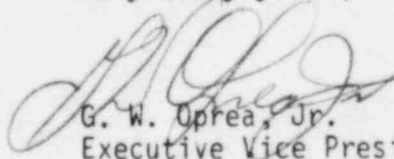
Dear Mr. Collins:

South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Response to Notice of Violation

Pursuant to the provisions of 10CFR2.201 enclosed is Houston Lighting & Power Company's response to Notice of Violation 50-498/84-07, 50-499/84-07 dated May 30, 1984.

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

Very truly yours,

  
G. W. Oprea, Jr.  
Executive Vice President

AJS/mg  
Attachment: Response to Notice of Violation (84-07)

W2B/COM2/a

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Q PDR

Houston Lighting & Power Company

ST-HL-AE-1106  
File Number:G2.4/D7.8  
Page 2

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ATTACHMENT  
SOUTH TEXAS PROJECT UNITS 1 & 2  
RESPONSE TO NOTICE OF VIOLATION  
50-498/84-07  
50-499/84-07

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I. NRC'S STATEMENT OF VIOLATION

Failure to Effectively Control Documents

Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality ... shall be accomplished in accordance with ... instructions, procedures, or drawings ... "

Section 6 of the Bechtel Quality Program, Revision 2, dated August 29, 1983, states, in part:

"Documents that prescribe the activities, requirements and responsibilities for the implementation of the South Texas Project are controlled. The controls include specified reviews and approvals by authorized individuals, records of the receipt, logging, tracking and distribution of quality-related documents.

"Documents pertaining to quality-related items, identified in this paragraph, are required to be controlled ..."

Contrary to the above, documents were not effectively controlled. Based on a sample of 27 drawings, 6 specifications, and 12 procedures, the following examples of the failure to follow procedures on document control were observed:

- a. Amendments were not always properly recorded on design documents as required by Procedure No. WPP 3.0, "Field Control of Design Documents," Revision 9, dated March 21, 1984, paragraph 7.4.2.1. Only two of the three copies of Drawing 3C019S01607 at station 130 were updated with Amendment CH-0035. At station 145, Drawing 3E560E55031 was not updated with Amendments DCN 3 dated March 22, 1984, and CE 2371 dated April 17, 1984; and Drawing 3E560E55032 was not updated with Amendments DCN 6, dated April 13, 1984, DCN 7 dated April 27, 1984, and CE02410 dated April 24, 1984. At station 27, Drawing 9E-20-OE-00104 had Amendment BE00224 recorded on the design document which was not applicable. At station 65, Specification 5L019PS004 did not have Amendment SCN 12 dated February 16, 1984, recorded on the design document nor was it on file at the station. In addition, Amendment SCN 10 dated January 13, 1984, which was recorded on the design document was not on file at the station.

- b. The field revision list was not always accurate as required by Procedure No. WPP 3.0, paragraph 7.2. The field revision list dated May 5, 1983, did not reflect the voiding of Amendments BC-00370 and BC 00389 and superseding of Amendment CC 00667 for Specification 3A010SS0030 accomplished by revision 3 of the specification dated January 16, 1984.
- c. Matrices of design documents were not always accurate as required by Procedure No. WPP 3.0, paragraph 6.1. Drawing 5E219E03011 was found at station 145 which was not on the matrix for distribution to station 145. It was noted that, as a result, Amendment CE02190 dated March 25, 1984, was not recorded on the design document. Two additional Specifications 5A010PS002 and 5L209PS1003 and a Drawing 5L549T60002 were found at station 65 which were not assigned to that station.
- d. The full history record did not always accurately reflect the document history as required by Procedure No. WPP 3.0, paragraph 5.1. The full history record did not reflect that field Amendments BC00370 and BC00387 were voided, and that CC00667 was superseded for Specification 3A010SS0030.
- e. Procedure changes were not always at stations as required by Procedure No. WPP 3.3, "Distribution of Procedures Manual," Revision 3, dated October 31, 1983. Station 27 did not have Amendment ICP-2 dated February 17, 1984, to Procedure No. CSP-19.

This is a Severity Level IV Violation. (Supplement II) (498/8407-01)

## II. REPLY

### Background

In November 1983, Bechtel assumed responsibilities for design document distribution and control from Ebasco. This control is implemented by the Field Document Control Center (FDCC). Since that time, Bechtel has implemented a computerized drawing distribution system and a distribution matrix for procedures, has adopted one half size drawings as standards, has refiled Ebasco field procedures in unique, identifiable binders and has made substantial backfit to the data base supporting the Field Revision List and the Full History Report. At the time of this violation, there were 84 stations at which over 300,000 documents were positioned.

Causes of Individual Findings of Nuclear Regulatory Commission (NRC)  
Inspection

- a. Current amendment documents were manually annotated on their parent documents. No program was in effect for closure of amendments that were not to be incorporated into the parent document. With each new revision of the parent document such amendments were manually annotated on each copy of the document to be distributed. With large numbers of amendments to post this task was completed with the increased probability of error.
- b. Field Change Requests (FCR's) written solely to void the information in another FCR were dispositioned not to be incorporated into the parent document. No provision was made for closure of such "voiding" FCR's. Specification revisions were issued with a sheet listing amendments and closure information. These sheets identified these "voiding" FCR's to be closed. No provision was made in the document system for such automatic closure; and as a result the Field Revision List (FRL) did not reflect these FCR's as voided amendments.

Some FCR's that were written, approved and distributed were later disapproved by Project Engineering. The FCR's were not forwarded to the Home Office, consequently Home Office hard copy records were not updated, and updating data base entries, (which at that time were made in the Home Office) were not made.

- c. The distribution, review and feedback cycle for the design document distribution matrices was complex and untimely.
- d. The Full History Record (FHR) inaccuracies identified are the same as those for the Field Revision List in Item (b) above. Both reports are printed from the same data base.
- e. Specific instructions regarding distribution and filing of document control procedures at the stations were not in effect.

Summary of Programmatic Problems Which Contributed to Field Document  
Control System Errors

- a. The large number of stations required an extensive commitment of resources and complex coordination to handle the large numbers of controlled documents.
- b. The stations were not "manned" full time.
- c. Base control documentation (FRL and Matrices) did not receive timely update and did not contain complete information.
- d. There was no requirement for "issuer" or "user" verification.



III. WITH REGARD TO THE CITED EXAMPLES OF FAILURE TO FOLLOW PROCEDURES INVOLVING DOCUMENT CONTROL, THE FOLLOWING CORRECTIVE ACTIONS HAVE BEEN COMPLETED:

- a. Amendment recording errors have been corrected by Bechtel personnel. Amendment annotation at the document stations has been verified.
- b. The document register data base, the FHR, and the FRL have been brought into consonance with the amendment information of the specification revisions.

FDCC records have been reviewed to identify those FCR's approved, distributed and subsequently disapproved. Bechtel Site Engineering reviewed these FCR's to verify there is no physical configuration problem. The FCR's were logged void by FDCC and distributed as necessary to correct the files.

- c. The distribution matrices were reviewed against the station files to verify agreement. Identified discrepancies were corrected.
- d. Discrepancies in the FHR are the same as identified in Item (b) above and were corrected by the same actions.
- e. Procedures and changes identified as not being at work stations have been replaced.

In order to improve the operation of field document control the following actions have been taken:

1. Procedures have been revised to uniformly recognize and use the Field Revision List as the standard to verify the status of a design document. The Field Revision List is distributed to each design document station.
2. Bechtel has made administrative changes in Bechtel supervision of the FDCC and the controlled stations.
3. Procedural changes have been made to standardize design document checkout at the controlled stations. These changes require the use of a standard "out" card for checkout and require the user to verify that the document being checked out is in consonance with the Field Revision List.
4. A revised matrix was issued for use in distributing design documents to the controlled stations.

The controlled stations have been verified to be adequate. During the transition to the improved field document control system described in Section IV, a periodic systematic review of controlled stations is being conducted by FDCC personnel. Discrepancies are corrected as they are identified.

Joint surveillances were performed by HL&P and Bechtel to verify that the measures taken to improve the field document control system provide adequate assurance that the end users are provided the correct design documents.

#### IV. CORRECTIVE STEPS TAKEN OR TO BE TAKEN TO AVOID FURTHER VIOLATIONS

In parallel with Bechtel and Ebasco actions to correct the cited discrepancies and ensure control at all document stations, Houston Lighting & Power (HL&P) initiated a management review.

Management review meetings, chaired by HL&P and with representatives from HL&P, Bechtel and Ebasco were held weekly, starting May 21, 1984, to set priorities, assign action items and establish completion dates.

HL&P made a systematic analysis of the document system, reviewing records and findings, observing document center and document station operations, and interviewing document control personnel to identify programmatic deficiencies and underlying problem areas. Findings were discussed at the management review meetings and provided a basis for corrective actions.

Under HL&P direction, alternates to the existing unmanned, multiple checkout station system were examined. Accordingly, HL&P has directed that a program for a single controlled document checkout source for each Area or Unit be adopted. Implementation will be phased by area and by type of document. Implementation for single checkout sources is scheduled to be accomplished by August 15, 1984. The details for implementation have been frequently discussed with the NRC resident inspector and a transition plan and system description are available for review at the South Texas Project (STP) Site.

Controls will be in place to assure only design documents from controlled checkout stations are permitted to be used for construction. Other stations located in the Unit or Area are Information Stations. Documents from Information Stations are not permitted to be used for construction. A Reference Station of controlled documents is maintained in the Unit or Area office to be used for planning. Documents at the Reference Station are not permitted to be removed from the station for use. After user review of Reference Station documents, the user will obtain controlled documents from the controlled document checkout station to perform work. With the single centralized source for construction documents the total number of document stations in the

units can be reduced, and the number of stations on the site containing controlled documents can be substantially reduced.

In each area, document distribution by type will be reviewed by user and document center personnel to establish new distribution requirements for the single checkout station and the Information Stations. Physical requirements for the checkout station will be identified and the station prepared to receive documents. Distribution matrix changes to reflect the new requirements will be made. The documents will be physically relocated, annotated with the new station identifier and/or downgraded to "Information Only" status, as necessary to be in conformance with the new requirements.

Once the single controlled document checkout source for each Area or Unit is in place, document control procedures will require that station personnel verify each document issued is in consonance with the FRL.

During this transition period, care will be taken to assure that the compliance achieved does not deteriorate whether the documents are within the previous or the new distribution configuration. Management review meetings will continue through the transitional phase and monitoring and surveillances as necessary to assure continuing compliance will be performed.

Additionally, HL&P will continue evaluating various recommendations and enhancements by which the document processing mechanics can be streamlined.

The following specifically address actions taken to prevent recurrence regarding the cited discrepancy examples.

- a. Home Office Engineering is tabulating, on the face of the parent documents, amendments which are not to be incorporated (NI FCRs) in the parent document. This process ends the requirement for the manual annotation of NI FCR's.
- b. Engineering procedures have been revised to define the use and status of the specification amendment sheets.

Home Office Engineering can no longer procedurally disapprove FCR's after initial approval.

- c. Distribution matrices are being issued for review and use on a regular periodic basis. The first issue was on May, 18, 1984. This commitment has been formalized by procedure. A revised format for the matrix revision request has been implemented.



- d. Corrective action to item (b) has also corrected the Full History Record.
- e. Changes to procedures have been made to provide for periodic verification of document control procedure manuals.

We believe that these corrections, the administrative enhancements described above, and the simplification inherent in the single checkout location plan constitute significant additional assurance that the STP document control system provides for effective control of quality related documents.

V. THE DATE WHEN FULL COMPLIANCE WAS ACHIEVED

STP is in compliance with regulatory requirements for document control in that the field document control system provides adequate assurance that the end users are provided the correct design documents.