

November 19, 1993

MEMORANDUM FOR: R. Wise  
Allegations Coordinator

THRU: - W. D. Johnson, Chief  
Projects Section A

FROM: D. P. Loveless  
Senior Resident Inspector, STPEGS

SUBJECT: CLOSURE OF ALLEGATION NUMBER RIV-93-A-0072

I have reviewed the referenced allegation for closure. This review included a verification of the actions taken by the licensee and addressed in their September 8, 1993 letter. Additionally, I determined the validity of the licensee's findings.

With respect to the managers inappropriate statement, the licensee identified at least two independent sources that had direct knowledge of the statements made. Therefore, the licensee determined that the allegation was substantiated.

I reviewed a copy of the video tape produced by Mr. Cottle and found it to be a very good statement of the problems. The bulletin was issued onsite and I had received a copy of it prior to this inspection. Additionally, evidence of Mr. Cottle's discussions with all affected individuals was documented.

Finally, the licensee's independent review of the SPEAKOUT program will be reviewed and inspected prior to plant restart. Therefore, I recommend that this portion of the allegation be closed.

In response to the allegation that the quality assurance organization was excluded from the ESF/Trip reduction task force was considered unsubstantiated by the licensee. I reviewed the interview with the QA manager involved. He stated that he simply felt that the manager named in the allegation did not want his organization on the task force. They were later placed on the task force. The interview with the manager involved corroborated this statement. He stated that he did not see any benefit that QA could provide, but he was not opposed to QA's presence when it was requested.

Therefore, I also recommend that this portion of the allegation be closed.

David P. Loveless

# The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

September 8, 1993  
ST-HL-AE-4565  
File No.: G25  
10CFR50.7

Mr. A. Bill Beach  
Director, Division of Reactor Projects  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498; STN 50-499  
Investigation of Allegations

In response to your letter of June 1, 1993, Houston Lighting & Power Company (HL&P) has investigated allegations relating to statements made by a manager regarding generation of a Station Problem Report (SPR). HL&P has completed its investigation of this matter and the results of this investigation are available onsite for NRC review.

The investigation indicates that this matter apparently involved statements and behavior that are inconsistent with HL&P's policy of encouraging individuals to raise safety concerns, and, where appropriate, to document those concerns on SPRs. Accordingly, HL&P is taking action to assure that all management and supervisory personnel, particularly those at senior levels, understand the need to manage and communicate in a manner which minimizes the risk of any potential chilling effect, either real or perceived. In addition to the actions described in my May 21, 1993 letter to you, which address similar issues, we have taken the following actions.

1. I have conducted a seminar for STP managers and supervisors on these issues to reinforce the need for sensitivity in responding to employee concerns that may be of potential safety significance. A copy of the videotape made at the seminar is attached. All management and supervisory personnel will view the videotape by October 15, 1993.

~~AS10260174~~

*Philip RIV*

Project Manager on Behalf of the Participants in the South Texas Project

2. All senior level site management have attended the sensitivity training described in my letter to Mr. Milhoan dated May 28, 1993 or have viewed the videotape of the training.
3. A short bulletin concerning this issue has been posted onsite to ensure that personnel understand management's approach to this issue and are aware that any behavior which may discourage employees from raising safety concerns or otherwise reporting problems will not be tolerated. Management expectations regarding responsiveness to employee concerns have also been reinforced in recent policy revisions and other site communications.
4. I have met with each of the individuals who might have been affected by this event to personally reinforce with them that preparation of the SPR in question was entirely appropriate and to encourage them to continue to bring any similar problems which they may become aware of to senior management.
5. An evaluation of the STP employee concerns program, SPEAKOUT, has been initiated. This evaluation will assess the program's policies, scope, procedures, and implementation, and will result in recommendations on how to assure that the program is effective in soliciting and responding to employee concerns. HL&P will keep the NRC apprised of the results of this evaluation and actions to address its recommendations.

Although the matters investigated did not involve any actual retaliation, HL&P believes that this occurrence underscores the need for sustained efforts to assure that the Company's policy of openness and responsiveness to concerns is fully appreciated and implemented.

Please call me at (512) 972-8434 should you wish to discuss this matter further.



William T. Cottle  
Group Vice President,  
Nuclear

JTC/pa

Attachment: "Responsiveness to Employee Safety Concerns" Videotape

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

ST-HL-AE-4565  
File No.: G25  
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c: Letter Only

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DRAFT

50.498 - 87-30  
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activities; however, the question of whether all unauthorized rework was identified, is inconclusive. In addition to the "final" inspection of the hardware, surveillances did identify unauthorized rework on occasion. Examples of this are in reports No. C-480 and C-502 dated July and September 1984.

In regard to production being pushed in violation of procedures, the above referenced nonconformance reports on unauthorized rework support such an observation. However, it should be noted that such problems were identified at the time of the events and corrective action was taken as a result. In regard to notification for inspection, it was found that the required inspections were performed immaterial of who may have phoned the request to QC. In regard to rework being performed before issuance of FCRs, again inspections did verify conformance to the approved FCR. Nonconformance reports did on occasion note violations to FCR requirements. In regard to incorrect material, the absence of a clover leaf in the time frame in question does not mean incorrect material was used for installation.

In summary, this allegation was not substantiated except for the allegations on unauthorized rework and pushing production. On unauthorized rework it can be said that the problems were indeed identified; however, both of these problems appear to have been identified at the time of their occurrence and corrective actions taken.

Although this allegation was partially substantiated, it has no significant safety impact.

(Closed) Allegation 4-86-A-111

This allegation relates to numerous problems identified on operability, maintainability, and accessibility which for example was addressed previously in NRC Inspection Report No. 87-07. Issues remaining open at the time of that inspection were the establishment of other items that were identified by the concernee during other meetings and on tours. Also the verification that there were no additional items, like B-66, which was initially dispositioned by the Task Force to "accept-as-is", but was later reworked as part of hot functional testing.

SAFETEAM established that there are only three known walkdowns in which the concernee was accompanied by Bechtel engineering personnel. A new concern number 11445 was assigned to these items. SAFETEAM also established another concern (number 11447) which addresses a walkdown with the NRC on November 7 and 10, 1986. Concern number 11445 addresses a walkdown on October 7, 1986, with the Assistant Project Engineer, and two walkdowns on November 13 with the Assistant Project Manager of Completion and Test Services and Assistant Project Manager of Operating Services. As was the case with the original concern, the individual items of these new concerns were evaluated for acceptability by a Special Task Force. The Special Task Force consisted of the Bechtel Assistant Project Engineer, Bechtel Lead Electrical Engineer, Bechtel Lead Instrument and Control

REV

John RIV

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Engineer, HL&P Staff Engineer, and HL&P Radiological Support Supervisor. Concern No. 11445 addresses 61 items of which 28 are duplicates of the original concern 11227. Only one new corrective action item was identified (item No. H-14). Concern No. 11447 addresses 25 items of which 15 are duplicates of the original concern 11227. As in the original concern both of these reports concluded that if they were left undetected none of the concerns identified could affect the safe operation or safe shutdown of the plant or affect the health and safety of the public. The results of the Task Force Review have been reviewed and concurred with by the cognizant HL&P engineering personnel. As on the original concern, an independent architect and engineering consultant reviewed both of these concerns (11445 and 11447). After a field inspection by the consultant, the engineering resolutions of all the new items were reconciled with field inspection results. The report DFE-STP-03 dated May 4, 1987, concludes that all concern resolutions (either rework or remain-as-is) appear proper, reasonable, and in-line with acceptable engineering, maintenance, or operation practice. All dispositions appeared to follow generally acceptable operation and maintenance practices.

The NRC inspector reviewed the SAFETEAM and independent consultant reports. This review verified the dispositions on all items. It was also noted that the disposition of the original 137 was corrected for item B-35 from corrective action required to accept as is. Also the February 5, 1987, list was verified to be correct for the disposition of items B-61 and B-18. In addition, the erroneously identified room number for B-49 and the item missing on the matrix but found on page 19 of the field notes were found to be corrected, reviewed, and repositioned by SAFETEAM.

In regard to the new items, as with the original items, the NRC inspector except for ALARA, considerations found none of the items impacted on the safe operation of the plant. The NRC inspector agreed with the disposition of the items.

In addition to the above, SAFETEAM developed three supplemental matrices regarding concerns Nos. 11227, 11445, and 11447. One of these matrices categorized each item in the concerns into categories of maintainability, operability, accessibility, personnel safety, design conformance, and susceptibility to damage. Another matrix related each of the categories to project activities which address that item. For example, item No. B-1 of concern No. 11227 which deals with the accessibility of valving in room 103 of the reactor containment building was categorized as an accessibility question on one matrix. The other matrix then identified some 11 project activities which address that category of concern such as valve accessibility walkdown, hot functional testing, limited power testing, and alike which would address the concern on that item. The last matrix describes the project activity, responsible organization, stage project life, purpose of activity, and disciplines affected. This matrix identified some 27 different project activities ranging from engineering design review to normal operation maintenance. The NRC inspector reviewed these matrices and noted that most but not all items fit into one category. Each category had at least four project activities that

addressed the concern and some with 11 or 13 activities. Most of the 27 project activities were completed, but not all. Exception being such activities as master completion list, limited power testing, and the like. Also, most of the project activities are subjected to NRC inspection or review. For example, such activities as engineering design review, nonconformance program, project records review, and startup testing activities have been subjected to NRC inspection. Such activities as high energy line break analysis, seismic interaction, internal missile review are subjected to NRC review. Only a few activities are not addressed by NRC inspection or review such as the STP model program. The NRC inspector found this was an acceptable general approach to these concerns and these type concerns on different items.

With regard to the ALARA review it should be noted that, allegations relating to the liquid and gaseous radioactive waste processing systems will continue to be evaluated by the Region IV staff as systems are completed and accepted by the licensee. These systems have been identified and are being tracked by open items in NRC Inspection Report 50-498/8630-06 and 8630-07.

Information utilized to evaluate the allegations was obtained from licensee correspondence to the NRC, SAFETEAM walkdown summaries, licensee ALARA waldown, and from visual inspection during the allegation review which was conducted during May 21, 1987. The followup allegations are referenced by identification numbers assigned by SAFETEAM during walkdown.

Item B-02, Concern No. 11227 stated that access to a valve gallery was obstructed and would present a radiation exposure problem if not removed. Access to the valve gallery is provided through an additional door from the east side.

No greater potential of exposure to radiation will result from using the designed access to the valve gallery from the east side.

Item B-34, Concern No. 11227 stated that a series of valves located in an extremely hot radiation area are inaccessible for operation. Two of the valves were identified by the licensee as process valves and require remote operation, two additional valves (BR205 and BR207) were not yet installed, and four vent valves were accessible.

The space in which the valves are installed is limited but sufficient for normal operation, and should not present a radiation exposure problem when operation is required.

Item K-01, Concern No. 11227 stated that a rubber hose attached to control valve CV-0381A will be affected by radiation.

The vendor design package states that the rubber hose with protective braid will accommodate movement of operation and is designed for

radiation exposure to 50 rads. No determination was made during the review to determine the estimated total exposure to the hose assembly during the life of the plant.

Item R-01, Concern No. 11227 stated that lines coming from a Liquid Waste Processing System (LWPS) seal water panel will contain radioactive water and require additional protection to prevent outleakage of radioactive water from the system.

The licensee reviewed the design and the expected differential pressures on the seals and stated that pressure on seal water system in the seal water egress corridor is higher than pressure in the LWPS panel. With seal failure, no radioactive water could pass through the seal water corridors and present a contamination problem in the seal water supply lines.

This item is one of the items that is covered in open item 50-498/8630-06 and 8630-07 and will continue to be reviewed by the NRC Region IV staff as systems are turned over from installation and construction and accepted by the licensee.

Item I-01 through I-14, Concern No. 11227 and Item R-02, Concern No. 11445 stated that conduits on the floor form contamination traps at points of attachment to the floor.

These conduits and the respective conduit straps have sufficient clearance under the conduits and around the anchored straps to permit cleaning if necessary.

Item 001, Concern No. 11447 regarded access to RHR pump seals for inspection, and stated that the pump seal is approximately 9 feet above floor level, and that lowering the pump would reduce the potential for radiation exposure during operations and maintenance.

The licensee reviewed the allegation and stated that the pumps are vertical operating pumps with bottom suction and side discharge and that the physical configuration would not permit lowering of the pump.

The pump is used infrequently during refueling outages and cooldown only. The mechanical seals are not normally inspected during operation and that failure of pump seals is immediately known by vibration monitoring.

An ALARA review should be conducted prior to any seal replacement, and this review should be conducted in accordance with licensee approved procedures and accepted industry practices.

Item 002, Concern No. 11447 stated that two valves should be relocated to the front side of the pump to reduce radiation exposure to operators and maintenance personnel.



One valve is a drain valve used to drain piping prior to pump maintenance while the other valve is an instrument root valve and is normally open. During normal operations no access is required. The pump is used infrequently during refueling outages and cooldown.

An ALARA review should be conducted prior to any pump maintenance and this review should be conducted in accordance with licensee approved procedures and accepted industry practices.

Based on the above review, activities of the technical and ALARA concerns as well as the generic approach, to this allegation are acceptable. This allegation is closed.

(Closed) Allegation 4-87-A-005

This allegation was that Ebasco QC personnel had identified problems associated with the processing of Field Change Request (FCR) No. EH-00268. This allegation was previously closed in NRC Inspection Report No. 50-498/86-38 and 50-499/86-38. Upon review of additional information, namely a Department of Labor (DOL) 210.b complaint by the alleged, it was determined that the exact area of concern had not been addressed. The DOL complaint identified that welding of fuel handling building HVAC plenum did not conform with the FCR in question.

The NRC inspector found that Ebasco had performed an investigation into this allegation subsequent to the DOL complaint. The Ebasco investigation concluded that at the time of the initial welding inspection, welding configurations were not in accordance with the FCR and that the welds should have been documented on a nonconformance report (deficiency notice (DN) or nonconformance report (NCR)). A later FCR No. EL-01149 provided an "as built" condition that would have been suitable for justifying an accept as is disposition. QC supervisor did fail to validate a DN on the welding and failed to properly document their justification for invalidation.

The NRC inspector found that the welding was subsequently documented on an NCR No. CH-03251 which accepted the welding in its as-is condition. The licensee did perform a review of this investigation and an independent followup. The licensee found the Ebasco investigation adequate and thorough with no further investigation required.

In summary, the allegation is substantiated in regard to FCR EH-00268. Welding did not conform to the FCR; however, there appears to be no quality problem in that the welding was acceptable to engineering. The NRC inspector found nothing to disagree with that disposition. The nonconforming condition involved a few feet of slightly undersize welds where shin plates had been used on one side of the plenum.

1986 NOV -4 PM 1:11  
U.S. MAIL

CASE NUMBER 4-86-A-111  
DATE OPENED 10/24/86  
FACILITY NAME STP

SUBJECT Alleged lack of safe accessibility.  
Possible H&I

SOURCE OF ALLEGATION contractor employee

NUMBER OF ALLEG. 2  
ASSIGNED TO RPSC  
CROSS REF. NO.  
ACTION SCHEDULED Interview alleger

FIRST/LAST NAME  
DATE ASSIGNED 10/24/86  
REPORT NUMBER  
FTS NUMBER 8-728-8100  
DUE DATE 01/10/87



ex 6

ALLEGATION SUBSTANT  
ENFORCEMENT ACTION  
SORT CODE C  
DATE CLOSED  
ACTION OFFICE RIV  
MAN HOURS  
REPORT PREPARATION  
ASSIST

DETAILS: An alleger wrote NRC HQ and advised his employer (Bechtel) refused to allow him to express "many more deficiencies" he has knowledge of. The alleger stated installations do not provide safe accessibility to equipment, instrumentation & valves. The alleger stated 50 "valves" need to be modified to provide personnel safety."

~~DO NOT DISCLOSE~~

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 6  
FOIA: 93-642

ex 6

KY  
RIV