

# The Light company

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

July 16, 1984  
ST-HL-AE-1109  
File Number: G2.4/Q17.1.1

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

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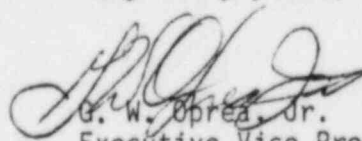
Dear Mr. Collins:

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, attached is Houston Lighting & Power Company's (HL&P) Response to the Notice of Violation 50-498/84-04, 50-499/84-04 dated June 14, 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

GWO/DJH/mpg  
Attachment: Response to Notice of Violation (84-04)

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PDR ADOCK 05000498  
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cc:

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South Texas Project  
Response to Notice of Violation  
50-498/84-04  
50-499/84-04

I. Statement of Apparent Violation

10CFR50, Appendix B, Criterion V, requires activities affecting quality to be performed in accordance with appropriate, documented, instructions, procedures, or drawings.

Criterion XV of 10CFR50, Appendix B, requires the establishment of means to control material, parts, or components which do not meet requirements in order to prevent their inadvertent use or installation.

Weld filler material was issued from the warehouse to field weld issue rooms. Prior to use from the field weld issue room, 250 pounds of filler material (5 boxes) were found to not be as labelled on the boxes. Nonconformance report (NCR) HM 00254, was issued and the material tagged and returned to the warehouse under procedure WPP/QCI 5.0, "Nonconforming Material, Parts, and Components", Rev. 9, dated February 2, 1982.

Contrary to the requirements of Criteria V and XV, Procedure WPP/QCI 5.0 did not provide direction for the disposition and reinspection of deficient weld filler material, nor were actions taken at the time of issuing the NCR (HM 00254) to establish the quality of the weld filler material of the same lot and heat number remaining in the warehouse.

This is a Severity Level V Violation (Supplement 2.E.)  
(498/499-8404-01).

II. Corrective Actions Which Have Been Taken and the Results Achieved

HL&P has reviewed the Notice of Violation and has determined that the standard site requirements for Nonconformance Reporting adequately addresses the disposition of NCR's. The disposition of the above reference NCR (HM 00254) gave clear direction on the return of the 250 lbs. of weld filler material identified by Ebasco to the warehouse and required reinspection of the remaining material in the warehouse by quality control. However, the disposition was not carried out in a timely manner. It was determined that the cause of the delay was due to inadequate direction in NCR procedures for the timely quarantine of additional suspect bulk material to preclude further issuance from Bechtel's Controlled Storage Areas until an evaluation/inspection has been performed.

The site standard for Nonconformance Reporting has been revised to address the above inadequacies.

Additionally, Bechtel has performed an investigation with regard to the weld filler material in question. Bechtel Material Control was notified of the NCR condition by an Ebasco Welding Engineer on Jan. 3, 1984. Prior to issuing additional material, Material Control personnel verified all weld filler material with the heat and reference numbers shown on the NCR. No additional mismarked containers were found. This verification was completed on January 4, 1984, but was not documented. The material was not placed on hold as no additional discrepancies were found. Material Control continued to issue weld filler material of this heat and reference number from Bechtel Controlled Storage Areas. However, it was not until April 4, 1984, when, per the disposition requirements indicated on the NCR, Bechtel QC was notified and an inspection was performed by Bechtel QC on the remaining material in Bechtel's Controlled Storage Areas. This inspection was documented as required by site procedures. No additional deficiencies were identified as a result of this inspection. No mismarked filler material has subsequently been found in the field.

### III. Corrective Action Which Will Be Taken to Avoid Further Violations

The Site Standard for Nonconformance Reporting has been revised to incorporate language that will require the initiator to determine if the nonconforming condition impacts similar bulk materials in Bechtel's Controlled Storage Areas. Ebasco will, upon validation of the NCR, notify Bechtel of the nonconforming condition and Bechtel will quarantine the suspect bulk material. Within seven workdays of NCR validation, Bechtel will initiate an evaluation of the suspect bulk material. The evaluation/inspection will be documented on a Field Inspection Report (FIR) and be made a part of the original NCR.

### IV. Date When Full Compliance Will Be Achieved

HL&P is in full compliance. The necessary changes to the Site Standard for Nonconformance Reporting have been implemented.