

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

April 28, 1992

ST-HL-AE-4078

File No.: G02.04

10CFR50

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Response to Weaknesses Identified in IR 92-04

Pursuant to 10CFR50, Houston Lighting & Power Company (HL&P) submits the attached response to weaknesses identified in NRC Inspection Report (IR) 92-04 concerning the Request For Action (RFA) program. The responses include a description of our corrective measures and the schedule for completing these actions.

Quality Assurance will monitor the effectiveness of these corrective measures and the RFA program during the required Technical Specification Corrective Action audit.

If there are any questions, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7205.

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Attachment: Response to Weaknesses Identified in IR 92-04

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A Subsidiary of Houston Industries Incorporated

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Revised 10/11/91

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South Texas Project  
Units 1 and 2  
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WEAKNESS:

RFA 91-1299 identified a loose Auxiliary Feedwater (AFW) sway strut and without apparent justification the Shift Supervisor declared the system operable without requesting a Conditional Release Authorization (CRA). The RFA/CRA program fails to provide a timely, acceptable basis to confirm operability. Procedure OPGP03-ZA-0088, Revision 1, Request for Action Program, provided no guidance to the Shift Supervisor for determining when an operability call resulting from a nonconforming condition should be supported by an Engineering CRA.

RESPONSE:

1. Design Engineering evaluated the effects of the loose sway strut on the AFW system and confirmed that had a CRA been requested for RFA 91-1299, Engineering would have been able to provide technical justification for a Conditional Release of "operable" without restrictions.
2. Plant Engineering will revise OPGP03-ZA-0088 by June 19, 1992 in order to provide guidance to Shift Supervisors for determining when an operability question requires a CRA.

WEAKNESS:

RFA 91-1618 changed the material for a valve dowel pin but a Document Change Notice (DCN) was not issued to show the change on the vendor drawing. The failure to maintain configuration control was noted to be a weakness in the RFA process.

RESPONSE:

1. DCN MD-2329 has been issued to update the vendor drawing.
2. A sampling of closed RFAs revealed that this was an isolated case. A memorandum was issued to Engineering personnel emphasizing the necessity to update affected design documents when an RFA disposition changes the plant configuration. The revision to OPGP03-ZA-0088 (identified above) will also include provisions to emphasize the necessity to update affected design documents.

WEAKNESS:

RFA 91-1560 did not properly reference DCN MD-2208 as a closure document and consequently the RFA was closed prior to issuance of the DCN. The failure to maintain DCN status current on the RFA was identified as a weakness in the RFA process.

RESPONSE:

1. DCN MD-2208 has been issued.
2. An investigation into the incident revealed the cause of this event to be a misunderstanding of the RFA form. A clarifying memorandum was issued to Engineering personnel to ensure that the RFA form is clearly understood by all Engineers performing dispositions. The revision to OPGP03-ZA-C088 (identified above) will also include provisions to clarify this issue.
3. A sampling of closed RFAs did not indicate a widespread problem. Based on these results, no other corrective actions are considered necessary.