

The Light company

Houston Lighting & Power

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

May 8, 1992
ST-HL-AE-4097
File No.: G02.04
10CFR50
10CFR2

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

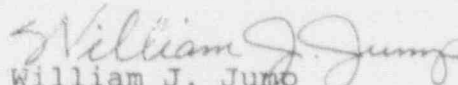
South Texas Project
Units 1 and 2

Docket Nos. STN 50-498 and STN 50-499

Reply to Notice of Violation 9206-02 Regarding Inadequate
Corrective Actions Evaluation Relative to MV Overthrust Conditions

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9206-02 dated April 10, 1992 and submits the attached response pursuant to 10CFR2, Appendix C.

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


William J. Jump
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SDP/

Attachment: Reply to Notice of Violation 9206-02

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... subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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L4/NRC/

I. Statement of Violation

During an NRC inspection conducted on February 24-28, 1992, 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, the violation is listed below:

Title 10 CFR Part 50, Criterion XVI states, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, during motor-operated valve testing in 1990 and 1991 a number of motor-operated valves were left in an overthrust condition after testing without performing appropriate site-specific evaluations to determine the required prompt corrective action.

This is a Severity Level IV violation. (498; 499/9206-02) (Supplement I)

II. Houston Lighting & Power Position:

HL&P concurs that the violation occurred.

HL&P had previously identified the concern described in the Violation. Prior to the Motor-Operated Valve (MOV) inspection by the NRC, the subject MOV overthrust requests for action (RFAs) had been found to be deficient by the Nuclear Assurance Department on January 24, 1992 during a follow-up review associated with their 1991 Assessment of the STP MOV Program. The RFA procedure requires documentation of an adequate technical justification for Conditional Release Authorizations (CRAs). However, Nuclear Assurance found that the CRAs for the overthrust MOVs were not adequately justified. All the previously as-left actuator thrust values that exceed the 110 percent thrust rating of the actuator were subsequently reevaluated in two new RFAs which included additional technical bases for declaring the MOVs operable in the as-left overthrust condition.

III. The Reason for the Violation:

The root cause of this violation was failure of personnel to strictly adhere to procedures and accurately complete work documents. A contributor to the root cause was less than adequate guidance on what constitutes acceptable technical justification for operability determinations.

IV. Corrective Actions:

As stated above, STP had identified the weakness in the corrective action program. A site-specific documented evaluation of the industry test data (the Westinghouse and Kalsi Reports) had not been performed at the date of the initial operability determination for the RFAs and the test data was not on site. All the previously as-left actuator thrust values that exceed the 110 percent thrust rating of the actuator were subsequently reevaluated in two new RFAs which included additional technical bases for declaring the MOVs operable in the as-left overthrust condition. HL&P is in the process of obtaining the actuator uprating program documentation from both Kalsi and Westinghouse for use in dispositioning the overthrust RFAs.

In addition, Engineering reviewed a sample of open nonconformance documents involving safety-related items for the purpose of determining whether the controls placed on Engineering dispositions of nonconforming conditions are adequate. The criteria used for this evaluation are based in part on the guidance provided in Generic Letter 91-018, "Resolution of Degraded and Nonconforming Conditions and on Operability" as well as the specific issues raised in this Notice of Violation. Concerns associated with the technical justifications for operability determinations (i.e., CRAs and Justifications for Continued Operation - JCOs) prepared for nonconformances (i.e., RFAs) addressing metallurgical problems on the Essential Cooling Water System were identified. These concerns had been identified prior to this review, and action was in progress to revise the JCOs. All operability determinations for these RFAs have since been updated to provide a valid, current technical basis.

Examples were also noted where CRAs, though technically valid, were lacking in clarity. Therefore, Conditional Release Authorizations for open safety-related RFAs will be enhanced where the current CRA as written is less than adequate when compared to the new guidelines for operability determination.

Overall, the evaluations of the nonconforming conditions identified in the review were complete, technically adequate and conservative in resolving the identified problem. In all the cases reviewed and evaluated, the operability determinations are considered valid.

Specific Actions Taken:

The following specific actions have been completed in order to enhance existing technical justifications for operability determinations and to prevent recurrence of this problem:

1. Purchase Orders have been issued to obtain both the Kalsi and Westinghouse MOV actuator uprating program test results.
2. The sample review of open nonconformance documents involving safety-related items was completed.
3. Guidelines on preparation of operability determinations based on the guidance provided in Generic Letter 91-018 have been issued for reference by Engineers who prepare Conditional Release Authorizations and nonconformance dispositions.
4. All conditional Release Authorizations for open safety-related RFAs will be reviewed and enhanced as needed to improve their clarity where the current CRA as written is less than adequate when compared to the new guidelines for operability determination. This action will be completed by June 12, 1992.
5. Familiarization training on the new guidelines for those who prepare and approve Conditional Release Authorizations has been initiated and is scheduled to be completed by June 27, 1992.

V. Date of Full Compliance:

HL&P is in full compliance.