

The Light company

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

January 18, 1996
ST-HL-AE-5276
File No.: G02.04.02
10CFR2.201

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

South Texas Project
Units 2
Docket Nos. STN 50-499
Reply to Notice of Violation 95027-01
Regarding Inappropriate Controls of Fuel Handling Equipment

The South Texas Project has reviewed Notice of Violation 95027-01, dated December 20, 1995, regarding inappropriate control of fuel handling equipment which resulted in improper rigging of the fuel handling machine, and submits the attached reply. In the transmittal letter for the subject violation, the Nuclear Regulatory Commission identified an apparent similarity with a prior Notice of Violation (93036-02). The following information is provided in response to this concern.

The South Texas Project's response to Notice of Violation 93036-02 stated that a policy statement on contractor control and performance monitoring had been written that clearly communicated Management's expectations. The policy statement has been incorporated in the Purchase Order/Contract Management, Monitoring, Reporting, and Rating procedure. This procedure was in place prior to and during the Unit 2 Fourth Refueling outage (2RE04). As a result of the actions taken in response to the Notice of Violation, increased emphasis on contractor control and performance monitoring have proven effective. The South Texas Project believes that the effectiveness of these actions was demonstrated by the results of the last Unit 1 refueling outage and by the recent Unit 2 outage which were both completed with good contractor performance.

Even though contractor control has improved over the last two years, this inappropriate control of fuel handling equipment event by contract personnel does not meet the expectations of South Texas Project management. As a result of the fuel handling equipment event, an action has been developed to further reinforce management expectations on oversight and control of contract personnel. This action is described within the text of this Notice of Violation response.

9601230165 960118
PDR ADOCK 05000499
Q PDR

The specific contractor controls in place during a refueling outage do not differ from the programmatic controls established for any contracted scope of work. The Purchase Order/Contract Management, Monitoring, Reporting, and Rating procedure clearly establishes that the Contract Technical Coordinator is responsible for ensuring that South Texas Project expectations are explicitly stated in procurement documents, for reviewing the contractor's management plan and supervisory organization to ensure that the contractor has an appropriate management structure and field supervisory practices, and for preparing an accompanying performance monitoring plan to ensure that contractor performance satisfies South Texas Project's stated expectations. Contract Technical Coordinators have received training on management's expectations as contained in the policy.

The contract with the refueling vendor for the 2RE04 outage scope of work included the stated expectations that the vendor comply with the Contractor Training and Qualification Program procedure, and all site procedures.

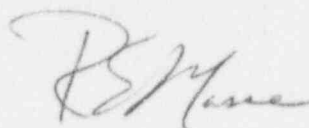
The refueling contractor technicians had satisfactorily completed site specific administrative training, including the Fuel Handling Machine procedure. In accordance with the Contractor Training and Qualification Program procedure, the contractor was allowed to work independently of South Texas Project personnel. Technical direction was a contractual function of the vendor's supervisory personnel. The vendor supervisor of the technician assigned to the fuel handling machine failed to ensure that the technician was qualified to perform the rigging task, nor did he perform direct oversight of the task or provide technical direction to the technician. As noted in the Inspection Report, the South Texas Project Refueling Team included the position of Shift Coordinator and one of these individuals was present at the time of the event. This position was created to provide support coordination and to facilitate the vendor's needs. However, the Shift Coordinators are not intended to be designees for the Contract Technical Coordinator and are not given responsibility to provide supervisory oversight of the contractors.

The performance monitoring plan, developed per the requirements of the Purchase Order/Contract Management, Monitoring, Reporting, and Rating procedure, requires that field coordination and continuous monitoring be performed by cognizant South Texas Project representatives. The procedure requires that the Contract Technical Coordinator "shall perform observations and inspections sufficient to ensure the Vendor is performing the work properly and on schedule". The requirements in the performance monitoring plan and the procedure may have led to some confusion as to how often monitoring would be performed and by whom.

The Contract Technical Coordinator believed that the monitoring requirement had been satisfied in that the vendor technicians (many of whom had performed a similar scope during the Unit 1 Fifth Refueling outage) had received training on the Fuel Handling Machine procedure and had been successfully screened via technical interviews and by the fact that the core off-load had been completed successfully. Despite this success, the Contract Technical Coordinator failed to ensure that the vendor performed to South Texas Project management's expectation at the start of core reload.

South Texas Project's management has concluded, based on the evaluation of this event and the attendant issue of contractor controls, that the current contractor control program is adequate and was effectively implemented in the 2RE04 outage. The program includes provisions for documentation of problems and incorporation of in-house operating experience. Accordingly, this event will be added as lessons learned for future Contract Technical Coordinator training.

If there are any questions regarding this reply, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7988.



R. E. Masse
Unit 2,
Plant Manager

JMP/lf

Attachment: Reply to Notice of Violation 95027-01

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-5276
File No.: G02.04.02
Page 4

c:

Leonard J. Callan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Thomas W. Alexion
Project Manager
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001 13H15

David P. Loveless
Sr. Resident Inspector
c/o U. S. Nuclear Regulatory Comm.
P. O. Box 910
Bay City, TX 77404-0910

J. R. Newman, Esquire
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

K. J. Fiedler/M. T. Hardt
City Public Service
P. O. Box 1771
San Antonio, TX 78296

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Central Power and Light Company
ATTN: G. E. Vaughn/C. A. Johnson
P. O. Box 289, Mail Code: N5012
Wadsworth, TX 77483

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61067
Houston, TX 77208

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

U. S. Nuclear Regulatory Comm.
Attn: Document Control Desk
Washington, D. C. 20555-0001

J. R. Egan, Esquire
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, D.C. 20037

J. W. Beck
Little Harbor Consultants, Inc.
44 Nichols Road
Cohasset, MA 02025-1166

Reply to Notice of Violation 95027-01
Regarding Inappropriate Controls of Fuel Handling Equipment

I. Statement of Violation:

During an NRC inspection conducted on October 8 through November 18, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violation is listed below:

- A. Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, recommends, in part, that procedures should be written covering the preparation for refueling and refueling equipment operation.

Plant General Procedure OPOP08-FH-0002, Revision 1, "Fuel Handling Machine," implements this requirement. Precaution 4.9 of this procedure requires that "An approved safety sling shall be attached to the hoist hook and tool to ensure fuel assembly is not dropped if load monitoring device fails."

Contrary to the above, on October 18, 1995, an approved safety sling was not attached to the hoist hook during fuel movement and would not have ensured that the fuel assembly would not be dropped had the load monitoring device failed. The safety sling had been attached between the load monitoring device and the fuel handling tool.

This is a Level IV violation.

II. South Texas Project Position:

The South Texas Project concurs that the violation occurred.

Reply to Notice of Violation 95027-01
Regarding Inappropriate Controls of Fuel Handling Equipment

III. Reason for the Violation:

The direct cause of this event was less than adequate supervisory oversight of the task. Contributing causes for improperly rigging the fuel handling machine were failure to follow procedure, inattention to detail, and less than adequate technician knowledge of South Texas Project fuel handling equipment.

The activities in the Fuel Handling Building were being performed by two contract technicians. There was also a utility Shift Coordinator in the Fuel Handling Building at the time of the event, but his responsibility was to provide support to the vendor in the completion of his contractual scope. The utility Shift Coordinator was not responsible for providing supervisory oversight for the ongoing activities in the Fuel Handling Building at the time. There was no other level of supervision in the Fuel Handling Building. Supervisory oversight to verify the correct rigging and procedural compliance could have prevented the event.

The technician who performed the rigging of the fuel handling machine requested assistance from a technician who had done this type of rigging before. The second technician was in the process of setting up the camera for fuel inspections and was not focused on the rigging activity. Proper work practices for verifying the correct rigging and personal accountability by the individual responsible for the fuel handling machine could have prevented this event.

The technician who was operating the fuel handling machine had operated the machine during the assembly insert shuffle, but did not have experience using the Spent Fuel Handling tool to move fuel at the South Texas Project. Had the technician been properly familiarized on the equipment at the South Texas Project, this event could have been prevented.

IV. Corrective Actions:

The following immediate actions were taken following this event:

1. As a temporary action, utility supervisory oversight was increased in the field. Fuel Handling Building Senior Reactor Operator and Core Load Oversight Manager positions were created for the remainder of the 2RE04 outage.

IV. Corrective Actions: (Continued)

2. The refueling team was briefed on this event. This brief included a discussion of the roles and responsibilities of all positions involved with the core reload.
3. The proper configuration of the fuel handling machine hoist was verified.
4. To increase technician knowledge of fuel handling equipment, the fuel handling machine and refueling machine were exercised with a "dummy" fuel assembly.

The following corrective actions will be taken as a result of this event:

1. The Fuel Handling Machine procedure will be enhanced to further clarify the proper configuration of the fuel handling machine hoist. In addition, an independent verification of proper rigging will be included.
2. Lessons learned from this event will be included as a case study in Contract Technical Coordinator training.

V. Date of Full Compliance:

The South Texas Project is currently in full compliance.