

MAY 19 1992

Docket Nos. 50-498
50-499
License Nos. NPF-76
NPF-80

Houston Lighting & Power Company
ATTN: Donald P. Hall, Group
Vice President, Nuclear
P.O. Box 1700
Houston, Texas 77251

Gentlemen:

SUBJECT: RESPONSE TO NRC INSPECTION REPORT NO. 50-498/91-34; 50-499/91-34

Thank you for your letter of March 27, 1992, in response to our letter and Notice of Violation (498;499/9134-01) dated February 26, 1992. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By:
Thomas P. Gwynn

A. Bill Beach, Director
Division of Reactor Projects

cc:
Houston Lighting & Power Company
ATTN: William J. Jump, Manager
Nuclear Licensing
P.O. Box 289
Wadsworth, Texas 77483

City of Austin
Electric Utility Department
ATTN: J. C. Lanier/M. B. Lee
P.O. Box 1088
Austin, Texas 78767

RIV:DRP/D *df* C:DRP/D *df* D:DRP
KKennedy;df ATHowell ABBeach
5/1/92 5/2/92 5/19/92

9205260076 920519
PDR ADOCK 0500049B
Q PDR

JE01/1

Houston Lighting & Power Company

-2-

City Public Service Board
ATTN: R. J. Costello/M. T. Hardt
P.O. Box 1771
San Antonio, Texas 78296

Newman & Holtzinger, P. C.
ATTN: Jack R. Newman, Esq.
1615 L Street, NW
Washington, D.C. 20036

Central Power and Light Company
ATTN: D. E. Ward/T. M. Puckett
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Corpus Christi, Texas 78403

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Mr. Joseph M. Hendrie
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State of Texas
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Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
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Licensing Representative
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Houston Lighting & Power Company
ATTN: Rufus S. Scott, Associate
General Counsel
P.O. Box 51067
Houston, Texas 77208

bcc to WNB (IE01)

bcc distrib. by RIV:

"D. Martin

JRP

DRS

DRSS-RPEPS

RIV File

RSTS Operator

Resident Inspector

Section Chief (DRP/D)

MIS System

Lisa Shea, RM/ALF

R. Bachmann, OGC

Project Engineer (DRP/D)

The Light company

Houston Lighting & Power

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

March 27, 1992
ST-HL-AE-4038
File No.: G02.04
10CFR 2.201

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

South Texas Project Electric Generating Station
Unit 1

Docket No. STN 50-498

Reply to Notice of Violation 9134-01

Regarding a Containment Integrity Technical Specification Violation

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9134-01 dated February 26, 1992. HL&P concurs that the cited violation occurred. HL&P has addressed the concerns relating to the understanding of Technical Specification containment integrity requirements by a broad range of personnel in our staff. The violation has been addressed as the subject of the attached Licensee Event Report 92-092 (Unit 1). In addition to the actions addressed in the Licensee Event Report a bulletin will be issued to operations, management and technical staff personnel. The bulletin will remind these personnel, when determining operability requirements or plant conditions for a given circumstance, to review not only the applicable Technical Specification sections, but also the applicable Updated Final Safety Analysis Report (UFSAR) sections. The bulletin will be issued by April 13, 1992.

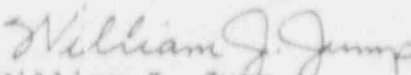
HL&P is in full compliance and appropriate actions are being taken to prevent recurrence.

~~9204010171~~

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-4038
File No.: G02.04
Page 2

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


William J. Jump
Manager,
Nuclear Licensing

RAD/krm

Attachment: Licensee Event Report 92-002
Regarding a Containment Integrity
Technical Specification Violation (ST-HL-AE-4000)

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE- 4038
File No.: G02.04
Page 3

cc:

Regional Administrator, Region IV
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Arlington TX 76014

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
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Revised 10/11/91

L4/NRC/

The Light company

Houston Lighting & Power

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

February 20, 1992

ST-HL-AE-4000

File No.: G26

10CFR50.73

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

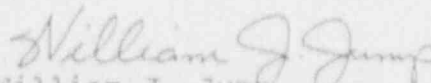
South Texas Project
Unit 1

Docket No. STN 50-498

Licensee Event Report 92-002 Regarding a
Containment Integrity Technical Specification Violation

Pursuant to 10CFR50.73, Houston Lighting & Power (HL&P) submits the attached Licensee Event Report 92-002 regarding a containment integrity Technical Specification violation. This event did not have adverse impact on the health and safety of the public.

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


William J. Jump
Manager,
Nuclear Licensing

JMP/sh

Attachment: LER 92-002 (South Texas, Unit 1)

9202250104

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-4000
File No.: G26
Page 2

cc:

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Revised 10/11/91

L4/NRC/

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

PLANT NAME (1)

South Texas, Unit 1

DOCKET NUMBER (2)

0 5 0 0 0 4 9 8

PAGE(S)

1 Of 0 4

TITLE (4)

Containment Integrity Technical Specification Violation

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)													
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME(S)	DOCKET NUMBER(S)												
1	0	1	8	9	1	9	2	-	0	0	2	-	0	0	0	2	2	0	9	2		

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)									
POWER LEVEL (10)	0	0	0	20.402(a)		20.405(c)		50.73(a)(2)(i)		73.71(b)	
				20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(ii)		73.71(c)	
				20.405(a)(1)(2)		50.36(c)(2)		50.73(a)(2)(iii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
				20.405(a)(1)(iii)	X	50.73(a)(2)(iv)		50.73(a)(2)(iv)(A)			
				20.405(a)(1)(iv)		50.73(a)(2)(v)		50.73(a)(2)(iv)(B)			
				20.405(a)(1)(v)		50.73(a)(2)(vi)		50.73(a)(2)(v)			

LICENSEE CONTACT FOR THIS LER (12)

NAME	Charles Ayala - Supervising Licensing Engineer	TELEPHONE NUMBER	5 1 2 9 7 2 - 8 6 2 8
AREA CODE			

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC?	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC?

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 words, i.e., approximately fifteen single-space typewritten lines) (16)

On January 24, 1992, Unit 1 was in Mode 1 at 100% when it was discovered that containment integrity requirements were violated beginning on October 18, 1991, and lasting approximately 47 hours. Repairs were made to a leaking handhole cover on the secondary side of steam generator 1C, while the unit was in Mode 4, in violation of the containment integrity Technical Specification. This event was caused by a misinterpretation of the requirements of the containment integrity Technical Specifications. Corrective actions include dissemination of information regarding this event to plant management and appropriate Operations, Licensing, and Scheduling personnel. This event will also be reviewed with appropriate plant personnel during Licensed Operator Requalification training and through a Management and Technical staff training bulletin. Additionally, Maintenance will add guidance to appropriate procedures, that containment integrity is required in Modes 1 through 4 and that opening secondary steam generator covers breaches containment integrity.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F430), U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104) OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503.

ACTIVITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
South Texas, Unit 1	05000498	92	002	00	2	OF 4

TEXT IF MORE SPACE IS REQUIRED, USE ADDITIONAL NRC Form 3054's (17)

DESCRIPTION OF EVENT:

On January 24, 1992, while Unit 1 was in Mode 1 at 100% power, it was discovered that, on October 18, 1991, repairs to a leaking handhole cover on the secondary side of Steam Generator 1C were performed while the unit was in Mode 4, in violation of the containment integrity Technical Specification.

On October 18, 1991, Unit 1 was in Mode 4. A leaking handhole cover on the secondary side of Steam Generator 1C was discovered and a work package was written to rework the cover to stop the leakage. As work was already scheduled to replace the packing on all four Main Steam Isolation Valves (MSIV), the work package was reviewed by the Shift Supervisor and other management personnel in order to avoid any scheduling problems or violations of Technical Specifications. The determination was made that the MSIV could be used as a Containment Isolation valve for integrity purposes and the work on the repacking of the Train C MSIV was rescheduled to be performed at a different time than the work to repair the handhole leak on Steam Generator 1C, to prevent having the valves inoperable at the same time the Steam Generator was open. Work to repair the leak began at approximately 0330 hours, when the cover was removed and lasted approximately 47 hours, until the cover was replaced and the nuts retorqued to design loads. In Modes 1-4, containment integrity is required by Technical Specification 3.6.1.1. The Technical Specifications definition of integrity requires that leakage rates be within the limits of specification 3.6.1.2. Since the removal of the handhole cover resulted in containment atmosphere being in contact with the MSIV, and the MSIVs are not leak rate tested per Technical Specification 3.6.1.2, this event represented a violation of Technical Specification 3.6.1.1, as compliance with the leak rate limits could not be demonstrated.

During this event, the handhole cover was in place over the handhole orifice for most of the 47 hours, although with no gasket in place and only 1 stud (with nut) and 2 guidepins loosely securing the cover to maintain cleanliness requirements. The safety significance of this event is minimal, since the MSIV remained closed throughout this event and the cover was in place for the majority of the time as well, providing additional boundary airflow restriction.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

ACTIVITY NAME (1) South Texas, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8	LER NUMBER (5)			PAGE (3)		
		YEAR 9 2	SEQUENTIAL NUMBER 0 0 2	REVISION NUMBER 0 0 0			
				0 3		OF 0 4	

TEXT: If more space is required, use additional NRC Form 366A's (17)

DESCRIPTION OF EVENT: 'CONT'D)

A review of the work document, performed prior to the event by management personnel, failed to disclose that removing the handhole cover in Mode 4 is a Technical Specifications violation. Discussions with the involved personnel indicated that they were not aware that the MSIVs are not leak rate tested and therefore, could not be used as containment isolation valves.

This event was recognized to be a reportable event after a similar situation arose during forced outage activities in Unit 2 in January, 1992. During this January, 1992, event, plant management and personnel recognized that repairs to a leaking handhole of the Steam Generator would be a violation of Technical Specifications and the unit was brought to Mode 5 to perform the repairs.

CAUSE OF THE EVENT:

This event was caused by a misinterpretation of the requirements of Technical Specification 3.6.1.1. Station personnel responsible for decisions regarding Technical Specification applicability made an incorrect assumption based on the misconception that the MSIV could be used as a Containment Isolation Valve.

ANALYSIS OF THE EVENT:

Technical Specification 3.6.1.1 requires that if containment integrity is lost, it must be restored within 1 hour or the Unit must be in Mode 5 within 30 hours. Since the handhole cover was loose for approximately 47 hours, this event represents a Technical Specifications violation and is reportable, pursuant to 10CFR50.73(a)(2)(i)(b). Since the MSIVs are not leak tested per 10CFR50 Appendix J requirements, it could not be ensured that containment leakage rates were within the limits set by Technical Specifications. This event did not result in an increased risk to the safe operation of the plant.

CORRECTIVE ACTIONS:

1. Dissemination of this LER to plant management has stressed that the Steam Generators are part of the containment boundary and that credit cannot be taken for the MSIVs to maintain containment integrity. This information was also disseminated to appropriate Operations, Licensing, and Scheduling personnel.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-820), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

UTILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (3)

PAGE (3)

South Texas, Unit 1

1 5 0 0 0 4 9 8

YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	PAGE (3)		
92	002	00	04	OF	04

TEXT IF MORE SPACE IS REQUIRED, USE ADDITIONAL NRC FORM 356A (1/77)

CORRECTIVE ACTIONS: (CONT'D)

- This event will be reviewed with appropriate plant personnel in Licensed Operators Regualification training and through a Management and Technical Staff training bulletin. Guidance on the necessity of performing thorough reviews of applicable Technical Specifications before authorizing work will be provided. This training will be completed by May 22, 1992.
- The Maintenance Department will add guidance to appropriate procedures, that containment integrity is required in Modes 1-4 and that opening secondary side steam generator covers breaches containment integrity. The procedures will be revised by April 15, 1992.

ADDITIONAL INFORMATION:

There have been no previous events at STP involving a containment integrity Technical Specification violation.