

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company  
South Texas Project, Units 1 and 2

Docket Nos.: 50-498; 50-499  
License Nos.: NPF-76; NPF-78

During an NRC inspection conducted March 15 through April 25, 1992, one 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 (Enforcement Policy), the violation is listed below:

Failure to Follow Procedure

Technical Specification (TS) 6.8.1.a requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. RG 1.33, Appendix A, Item 1.c, requires administrative procedures for equipment control (tagging). This is accomplished by OPGP03-ZO-0039, Revision 1, "Configuration Management."

Step 1.2.1 of OPGP03-ZO-0039 states that the equipment clearance program prevents component or system operation when the operation of the component might cause personnel injury or equipment damage.

Contrary to the above, on April 1, 1992, during an NRC walkdown of Equipment Clearance Order (ECC) 1-92-502, four electrical circuit breakers were not tagged. The four circuit breakers were associated with the Unit 1 Train A essential cooling water system to essential chilled water system chiller outlet valves that were previously removed by the implementation of a temporary modification. The failure to follow the configuration control procedure resulted in a potential personnel and equipment hazard because no controls were in place to ensure that the four electrical circuits remained de-energized.

This is a Severity Level IV violation. (Supplement I) (498/9208-02)

Pursuant to the provisions of 10 CFR Part 2.201, Houston Lighting & Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an Order or Demand for

Information as to why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 22<sup>nd</sup> day of *May* 1992