



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUN - 1 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: NOTICE OF VIOLATION (NRC INSPECTION REPORT NOS. 50-498/92-07;
50-499/92-07)

This refers to the NRC special followup inspection team led by Dr. Dale A. Powers of this office during March 9-13, March 23-27, and April 14, 1992. The inspection included a review of activities authorized for your South Texas Project Electric Generating Station. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. In particular, the team gathered specific and programmatic information to enable NRC to address issues identified in a 10 CFR Part 2.206 Petition, dated February 10, 1992, and in other related information given to the news media (i.e., draft press release and draft notices of violation). The specific areas inspected included the general employee training and specific training for maintenance employees and for contract security employees; maintenance work controls and maintenance work package backlog; security controls for escorting visitors; internal radiation exposure assessment of exiting employees; handling of employee concerns; and corrective actions taken as a result of licensee review of issues provided in the petition. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress.

As discussed in the enclosed report, the team substantiated a number of concerns expressed by the petitioner, however, most did not have direct bearing on plant safety or regulatory requirements. Many of the petitioner's concerns related to historical problems that have continued in the implementation of the maintenance program and, in particular, during the instrumentation and control activities. Some of these historical problems were previously documented in the Maintenance/Surveillance functional section

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of the July 31, 1991, Systematic Assessment of Licensee Performance Report (NRC Inspection Report 50-498/91-99; 50-499/91-99).

We believe that there are several issues that should be discussed in a management meeting with your staff. The potential benefit of this meeting was discussed with you in the NRC exit meeting. Management meeting topics should include the safety implications arising from an increased backlog of plant maintenance needs and the management controls that ensure that safety-related needs are promptly recognized and assigned appropriate priority. Another issue that we wish to discuss is the lack of procedural adherence that was exhibited by some maintenance workers during the performance of nonsafety-related activities. We are concerned since the same administrative controls on procedural compliance are in place for all maintenance activities whether or not they are related to safety. We will contact you by separate correspondence to arrange the details for this meeting.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements as specified in the enclosed Notice of Violation (Notice). The violations are of concern because they indicate the presence of a lax attitude that has been exhibited by certain workers at the facility toward ensuring compliance with visitor escort procedures. We also are concerned with the lack of timely immediate corrective actions taken in response to the notification of the apparent violations by the petitioner, information given to the news media and subsequently provided to your staff, and the NRC team findings. Your response to the Notice should specifically address each of these concerns.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specified actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR Part 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

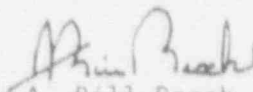
The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Houston Lighting & Power Company

-3-

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



A. Bill Beach, Director
Division of Reactor Projects

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
50-498/92-07; 50-499/92-07 w/Attachments

cc w/enclosures:

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

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
P.O. Box 2121
Corpus Christi, Texas 78403

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, Georgia 30399-3064

Houston Lighting & Power Company

-4-

Mr. Joseph M. Hendrie
50 Bellport Lane
Bellport, New York 11713

Bureau of Radiation Control
State of Texas
1101 West 49th Street
Austin, Texas 78756

Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
Bay City, Texas 77414

Licensing Representative
Houston Lighting & Power Company
Suite 610
Three Metro Center
Bethesda, Maryland 20814

Houston Lighting & Power Company
ATTN: Rufus S. Scott, Associate
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P.O. Box 61867
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bcc distrib. by RIV:

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 DRP
 Lisa Shea, RM/ALF
 DRSS-RPEPS
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 DRS
 Allegations Coordinator (2)
 G. F. Dick, NRR
 L. T. Ricketson
 L. E. Williamson, OI
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Resident Inspector
 Section Chief (DRP/D)
 MIS System
 RSTS Operator
 RIV File
 R. Bachmann, OGC
 G. F. Sanborn, EO
 W. B. Jones
 T. W. Dexter
 D. A. Powers

RIV:SRI*	SPSI:FIPS*	SRS:FIPS*	SPE:PSD*	SPM:NRR*	AC:RA*
DAPowers	TWDexter	LTRicketson	WBJones	GFDick	RWise
/ /92	/ /92	/ /92	/ /92	/ /92	/ /92
EO:RA*	C:TPS*	D:DRS	D:DRP		
GSanhorn	JGagliardo	SJGallins	ABBA		
/ /92	/ 92	6/20/92	6/1 /92		

*previously concurred

bcc distrib. by RIV:

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RIV:SRI*	SPSI:FIPS*	SRS:FIPS*	SPE:PSD*	SPM:NRR*	AC:RA*
DAPowers	TWDexter	LTRicketson	WBJones	GFDick	Rwise
/ /92	/ /92	/ /92	/ /92	/ /92	/ /92
EO:RA*	C:TPS*	D:DRS	D:DRP		
GSanborn	JGagliardo	SJedittins	ABBeach		
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