

The Light company

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

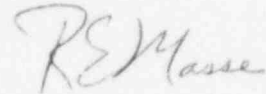
April 1, 1996
ST-HL-AE-5327
File No.: G02.04.02
10CFR2.201

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Unit 1
Docket Nos. STN-499
Reply to Notice of Violation 96001-01 Regarding
Failure to Follow Technical Specification Requirements

South Texas Project has reviewed Notice of Violation 96001-01, dated March 7, 1996, regarding failure to place Unit 2 in hot shutdown within the specified time when a Technical Specification Limiting Condition for Operation was not met. The event described in the Notice of Violation did not have an adverse effect on the health and safety of the public.

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



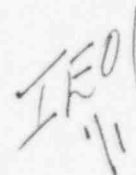
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Attachments: 1. Reply to Notice of Violation 96001-01

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South Texas Project Electric Generating Station

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Reply to Notice of Violation 96001-01

I. Statement of Violation:

Technical Specification 3.7.1.7 states that "Each main feedwater isolation valve (MFIV) shall be operable." The associated action statement allows that, "with one MFIV inoperable, subsequent operation in Mode 3 may proceed provided the isolation valve is maintained closed."

Technical Specification 3.0.3 required, in part, that, when a limiting condition for operation is not met, except as provided in the associated action requirements, within 1 hour action shall be initiated to place the unit in a mode in which the specification does not apply by placing it in at least hot shutdown within the following 6 hours.

Contrary to the above, from approximately 11 p.m. on January 18, 1996, until 10:28 a.m. on January 19, two MFIVs had been declared inoperable as the result of corrective maintenance activities, and the licensee failed to initiate action to place the unit in hot shutdown within the specified time.

This is a Severity Level IV violation (Supplement I) (499/96001-01).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

South Texas Project Licensee Event Report 499/96-001, letter from J. F. Groth to the NRC Document Control Desk dated February 19, 1996 (ST-HL-AE-5294), provides a description of the event.

The root cause of this occurrence was misapplication of the interpretation for Technical Specification 3.7.1.7 resulting in the performance of maintenance that affected the operability of more components than allowed by Technical Specifications.

The root cause for the delay into Technical Specification 3.0.3 was a lack of questioning attitude during two shift turnovers regarding the condition of two main feedwater isolation valves that were placed out of service.

Contributing to this event was ineffective communications between the outage work start authority and the control room.

IV. Corrective Actions:

The lessons from this event resulted in discussions regarding enhanced management expectations including emphasis on clear, concise communications, use of the chain of command, and control of logging entry into Technical Specification Limiting Conditions for Operation. These expectations were discussed with the operating crews of both units.

Guidance has been issued regarding communications and work coordination between the outage work start authority and the Control Room.

Procedure OPOP01-ZQ-0022, "Plant Operations Shift Routines", was revised to include main feedwater isolation valves in the Mode 3 Safety Function Checklist. The Safety Function Checklist is reviewed during shift turnover to ensure Technical Specification minimum equipment and instrumentation requirements are met for the applicable plant mode.

V. Date of Full Compliance:

South Texas Project is in full compliance.

VI. Additional Information:

A revision to Technical Specification 3.7.1.7 will be submitted as part of the station's Improved Technical Specification submittal. The implementation of Improved Technical Specifications should eliminate the need for Technical Specification Interpretations and clear up potential confusion surrounding the application of Technical Specification 3.7.1.7.