



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

APR 10 1996

Houston Lighting & Power Company
ATTN: William T. Cottle, Group
Vice President, Nuclear
P.O. Box 289
Wadsworth, Texas 77483

SUBJECT: NRC INSPECTION REPORT 50-498/96-01; 50-499/96-01

Thank you for your letter of April 1, 1996, in response to our letter and Notice of Violation dated March 7, 1996. 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,

A handwritten signature in cursive script, appearing to read "Arthur J. Dyer".

J. E. Dyer, Director
Division of Reactor Projects

Dockets: 50-498
50-499
Licenses: NPF-76
NPF-80

cc w/enclosure:
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Houston Lighting & Power Company

-3-

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APR 10 1996

E-Mail report to D. Nelson (DJN)
E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan	Resident Inspector
DRP Director	DRS-PSB
Branch Chief (DRP/A)	MIS System
Project Engineer (DRP/A)	RIV File
Branch Chief (DRP/TSS)	R. Bachmann, OGC (MS: 15-B-18)
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)	

DOCUMENT NAME: R:_STP\ST601AK.DPL

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APR 10 1996

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bcc to DMB (IE01)

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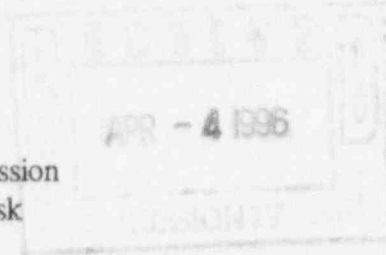
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The Light company

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.

R. E. Masse
Unit 2 Plant Manager

KJT/

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

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-5327
File No.: G02.04.02
Page 2

c:

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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.