



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

511 HYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUL 13 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. 50-498/92-05; 50-499/92-05

Thank you for your letter of May 4, 1992, in response to our letter and Notice of Violation (498/9205-01) dated April 8, 1992. We noted that Licensee Event Report (LER) 50-498/92-003 was enclosed with your response and was intended to address some of the information required by the Notice of Violation (Notice). We find this practice to be acceptable provided that all the information required by the Notice is explicitly addressed, either in the cover letter, the LER, or both. 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. Bill Beach
A. Bill Beach, Director
Division of Reactor Projects

cc: (see next page)

9207200061 920713
PDR ADOCK 05000498
Q PDR

JEO

Houston Lighting & Power Company

-2-

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 1089
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.
1515 L Street, NW
Washington, D.C. 20036

Central Power and Light Company
ATTN: D. E. Ward/T. M. Puckett
P.O. Box 2127
Corpus Christi, Texas 78403

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, Georgia 30339-3064

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

Houston Lighting & Power Company

-3-

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

Houston Lighting & Power Company
ATTN: Rufus S. Scott, Associate
General Counsel
P.O. Box 61867
Houston, Texas 77208

JUL 13 1992

bcc to DMB (IE01)

bcc distrib. by RIV:

R. D. Martin

DRP

Lisa Shea, RM/ALF, MS: MNBB 4503

DRSS-FIPS

Project Engineer (DRP/D)

DRS

Chief, Technical Support Section

Resident Inspector

Section Chief (DRP/D)

MIS System

RSTS Operator

RIV File

R. Bachmann, OGC, MS: 15-B-18

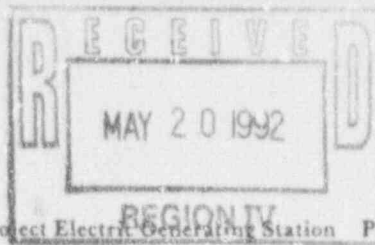
RIV:DRP/D *Max*
MASatorius:ww
7/7/92

C:DRP/*[Signature]*
ATHowe*[Signature]*
7/7/92

D:DRP
ABBeach
7/11/92

**The Light
company**

Houston Lighting & Power



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

May 4, 1992
ST-HL-AE-4080
File No.: G02.04
10CFR 2.201

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

South Texas Project
Unit 1
Docket No. STN 50-498
Reply to Notice of Violation 9205-01 Regarding
Failure to Follow Procedures During
RCS Flow Transmitter Restoration

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9205-01 dated April 8, 1992. HL&P concurs that the cited violation occurred. The violation has been fully addressed as the subject of the attached Licensee Event Report 92-003 (Unit 1).

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

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

William J. Jump
William J. Jump
Manager,
Nuclear Licensing

RAD/lf

Attachment: Licensee Event Report 92-003
Regarding Failure to Follow Procedures During
RCS Flow Transmitter Restoration

92-
0739

~~9205110176~~ zpp

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE- 4080
File No.: G02.04
Page 2

CC:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
c/o U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

D. E. Ward/T. M. Puckett
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

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

K. J. Fiedler/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61867
Houston, TX 77208

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 10/11/91

LA/NRC/

ATTACHMENT
ST-HL-AE-4090
PAGE 1 OF 6

The Light company

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

April 13, 1992
ST-HL-AE-4068
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 92-003
Reactor Trip Due to Failure to Follow
Procedures During RCS Flow Transmitter Restoration

Pursuant to 10CFR50.73, Houston Lighting & Power (HL&P) submits the attached Licensee Event Report 92-003 regarding a reactor trip due to failure to follow procedures during RCS flow transmitter restoration. 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.

Warren H. Kusek
for William J. Jump
Manager,
Nuclear Licensing

MAC/nl

Attachment: LER 92-003 (South Texas, Unit 1)

~~9204210378~~ 6pp

ATTACHMENT

ST-HL-AE-4080

PAGE 2 OF 6

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-4068
File No.: G26
Page 2

cc:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
c/o U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

D. F. Ward/T. M. Puckett
Central Power and Light Company
P. O. Box 121
Corpus Christi, TX 78403

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

K. J. Fiedler/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61867
Houston, TX 77208

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 10/11/91

L4/NRC/

NRC FORM 365
15-031

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED DATE NO. 31030104
EXPIRES 4/30/92

ESTIMATE BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 900 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (N-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (31500104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) South Texas, Unit 1

DL NET NUMBER (2) 0500104981

PAGE (3) 04

TITLE (4) Reactor Trip Due to Failure to Follow Procedures During RCS Flow Transmitter Restoration

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MONTH	DAY	YEAR	YEAR	FEDERAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NO. YES		DOCUMENT NUMBER(S)
03	14	92	92	003	004	03	14	92			050010

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

OPERATING MODE (1)	20.402(a)	20.406(d)	50.73(a)(2)(i)	73.71(a)
1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
POWER LEVEL (10)	20.408(a)(1)(i)	50.38(d)(1)	50.73(a)(2)(ii)	73.71(a)
100	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	20.408(a)(1)(ii)	50.39(a)(2)	50.73(a)(2)(iii)	OTHER: Specify in (12) next below and in Title, NRC Form 365A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	20.408(a)(1)(iii)	50.73(a)(2)(iv)	50.73(a)(2)(v)	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	20.408(a)(1)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vi)	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	20.408(a)(1)(v)	50.73(a)(2)(vi)	50.73(a)(2)(vii)	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

LICENSEE CONTACT FOR THIS LER (12)

NAME: Charles Ayala - Supervising Licensing Engineer

TELEPHONE NUMBER: 512 972-8628

AREA CODE: 512

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 NO

EXPECTED SUBMISSION DATE (15)

MONTH: DAY: YEAR:

ABSTRACT (Limit to 1400 words, i.e., approximately fifteen single space typewritten lines) (16)

On March 14, 1992, Unit 1 was in Mode 1 at 100% power. A reactor trip occurred at approximately 1108 hours from a momentary false reactor coolant low flow trip signal. Instrumentation & Control Technicians calibrating the Reactor Coolant flow transmitter reversed the procedural sequence of restoring the transmitter causing a momentary low (below setpoint) differential pressure to be detected by the two adjacent flow transmitters. This event completed the logic in the Solid State Protection System to trip the reactor. The cause of this event was failure to follow procedures which resulted from insufficient supervisory and management emphasis on the risk associated with the task, and a limited sense of responsibility by the technicians to ensure proper task completion. The actions being taken to correct this event are: supervision is required to be present to ensure emphasis is placed on completing the activity correctly when a potential reactor trip could occur; clear direction for use and physical presence of procedures has been provided to maintenance craftsmen; and a memorandum from management was issued emphasizing the self-checking principle.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN FOR RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-830), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

TEC-101, same space as required, use appropriate NRC Form 308A (8-88)

DESCRIPTION OF EVENT:

On March 14, 1992, Unit 1 was in Mode 1 at 100 percent power. A reactor trip occurred at approximately 1108 hours from a momentary false reactor coolant low flow trip signal. At that time, Instrumentation and Control technicians were calibrating a flow transmitter for Reactor Coolant Flow Loop 2 Protection Set 2. The work document to perform the calibration was initiated on March 13, 1992, due to an evaluation of the previous two transmitter data and channel comparisons rendering the transmitter calibration suspect. The work document instructions directed the technicians to use a surveillance procedure. The transmitter was removed from service and as found data was recorded. An adjustment was made to the transmitter to bring it within tolerance. While returning the transmitter to service, the transmitters high pressure side valve was opened first instead of the low pressure side valve to pressurize the transmitter which was contrary to the procedure. A momentary low (below setpoint) differential pressure was detected by two adjacent flow transmitters. This completed the two-out-of-three coincidence logic in the Solid State Protection System and with the Nuclear Instrumentation System permissive P-8 being satisfied (Reactor Power above 40% Power), the reactor tripped on reactor coolant low flow. The plant was stabilized in Mode 3. The main steam isolation valves were closed to limit Reactor Coolant System cooldown. The NRC was notified on March 14, 1992 at 1327 hours.

The three transmitters, that measure reactor coolant flow, are connected to the process line by a common tap on the high pressure side. This is a unique piping arrangement. The opening of the high pressure valve first results in the two adjacent flow transmitters momentarily supplying the pressure needed to pressurize the transmitter being returned to service. A momentary pressure drop of approximately three pounds per square inch is all that is required to exceed the differential pressure setpoint.

CAUSE OF EVENT:

The cause of this event was failure to follow procedures which resulted from insufficient supervisory and management emphasis on the risk associated with the task, and a limited sense of responsibility by the technicians to ensure proper task completion. In addition, management controls over procedure usage were not clearly stated resulting in confusion over requirements for having procedures present during task performance.

ATTACHMENT
ST-HL-AE-4080

PAGE 5 OF 6

EXPIRES 4/30/97

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 300 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-330), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0194), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

NRC FORM 3664
10-89

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (3)

PAGE (3)

South Texas, Unit 1

0 5 0 0 0 4 9 8 9 4 - 0 0 3 - 0 0 0 3 OF 0 4

TEXT (if more space is required, use additional NRC Form 3664's) (17)

CAUSE OF EVENT: (Continued)

The technician in the Reactor Containment Building (RCB) performing the work to return the transmitter to service did not have a copy of the procedure in his possession, but rather was following verbal instructions from a technician in the relay rack area of the Electrical Auxiliary Building who did possess the procedure. The technician providing verbal direction failed to read and communicate specific steps for return to service. The technician in the RCB valved 1, the flow transmitter in the reverse order.

ANALYSIS OF EVENT:

The event is reportable pursuant to 10CFR50.73(a)(2)(iv). There were no adverse radiological or safety consequences as a result of this event. Engineered Safety Systems functioned as designed and no unexpected post-trip transients occurred.

CORRECTIVE ACTIONS:

1. Shift and Unit supervisors are being briefed and it is being emphasized that they will be held accountable for taking conservative action, including power reduction or other actions that will increase the safety margin and/or reduce the risk of a plant transient or trip when evaluating the safety impact of work or testing and to monitor these activities to ensure that they are controlled. This activity will be completed by May 1, 1997.
2. Plant Management has established a reactor trip prevention policy which adds administrative controls to work activities that have a potential to cause a reactor trip. These activities are required to be under direct control of an on-the-scene supervisory individual to ensure the job is completed correctly and within safety margins.
3. A Maintenance Department Standing Order was issued requiring that performers of a procedure will have a copy of the procedure or, at the minimum, a copy of the portion of the procedure that is to be performed by those personnel who are working at locations other than where the controlling procedure is maintained.

NRC FORM 366A
 10-92

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)
 TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-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.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
South Texas, Unit 1	015100049892	0	03	0	04	OF 04

TEXT IF A SPACE IS REQUIRED, USE ADDITIONAL NRC FORM 366A (17)

CORRECTIVE ACTIONS: (Continued)

4. Department training sessions will be conducted for appropriate maintenance personnel. The session will discuss the lessons learned from this event and the training will be completed by May 28, 1992.
5. Management has issued a memorandum to emphasize the importance of the self-checking principle and to request line management to reinforce these principles with their personnel.

ADDITIONAL INFORMATION:

Similar events have been reported regarding reactor trips due to failure to follow procedure which are LER 89-011 (Unit 2) "Inadvertent Safety Injection and Reactor Trip System Actuations Due to Personnel Error", LER 90-013 (Unit 2) "Reactor Trip Caused by Manipulation of the Incorrect Reactor Trip Breaker Test Pushbutton" and LER 91-022 (Unit 1) "Reactor Trip During Performance of SSPS Logic Functional Test".

JUL 13 1992

bcc to DMB (IE01)

bcc distrib. by RIV:

R. D. Martin

DRP

Lisa Shea, RM/ALF, MS: MNBB 4503

DRSS-FIPS

Project Engineer (DRP/D)

DRS

Chief, Technical Support Section

Resident Inspector

Section Chief (DRP/D)

MIS System

RSTS Operator

RIV File

R. Bachmann, OGC, MS: 15-B-18

RIV:DRP/D *Mart*
MASatorius:ww
7/7/92

C:DRP/D *[Signature]*
ATHow *[Signature]*
7/7/92

D:DRP *[Signature]*
ABeach *[Signature]*
7/11/92