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

June 10, 1992
ST-HL-AE-4115
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 88-035, Revision 1
Regarding Nonperformance of a Required
Surveillance Test for a Component Cooling
Water Valve Due to an Inadequate Procedure

On June 17, 1988, Houston Lighting & Power (HL&P) submitted Licensee Event Report (LER 88-035) regarding a missed surveillance test for a Component Cooling Water valve due to an inadequate procedure. Pursuant to 10CFR50.73, HL&P submits Revision 1 of LER 88-035 which revises two corrective actions.

A review of the original response to this LER was performed and it was determined that these two corrective actions were impractical to maintain. The revised corrective actions will provide for a quality, high integrity program while ensuring a more efficient utilization of resources. The revised corrective actions are in accordance with the Inservice Testing Program for Pumps and Valves and the Surveillance Testing Program. The revised portions of the LER are marked with change bars in the right margin.

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.

William J. Jump
Manager,
Nuclear Licensing

JMP/lf

Attachment: Licensee Event Report 88-035, Rev. 1
(South Texas Unit 1)

LER\92121001.U1

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

L4/NRC/

NRC FORM 366 (6-89) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES 4/30/92

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.

LICENSEE EVENT REPORT (LER)

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

TITLE (4) Nonperformance of a Required Surveillance Test for a Component Cooling Water Valve Due to an Inadequate Procedure

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 5	1 8	8 8	8 8	0 3 5	0 1	0 5	1 0	9 2		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	5
POWER LEVEL (10)	0 0 0

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

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Charles Ayala - Supervising Licensing Engineer	AREA CODE 5 1 2 9 7 2 - 8 6 2 8

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	
D											

SUPPLEMENTAL REPORT EXPECTED (14)

		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On May 18, 1988, while the plant was in Mode 5, the System Engineer found that the Component Cooling Water (CCW) Train 1B valve operability test performed on February 11, 1988, had not yet been evaluated for change in stroke time per ASME Section XI. The evaluation was performed and the results indicated that one of the valves covered by the test required an increased testing frequency. Due to the lack of a timely review, two required surveillances had been missed. Immediate review of the latest valve operability surveillance for CCW Train 1B, performed on May 13, 1988, showed the valve of concern within its allowable stroke time. The missed surveillance testing was due to a lack of timely review of the surveillance test package, which resulted from an inadequate tracking program. Surveillance frequency for the affected valve was increased, and a verification of review was performed for other ASME Section XI surveillance test packages. To prevent recurrence of the event, the surveillance program has been revised to provide an improved system to track surveillance test packages through the review cycle and to alert responsible personnel to test packages not receiving timely attention. The Independent Safety Engineering Group performed a review of this and similar events, with no adverse findings.

LER\92121001.U1

DESCRIPTION OF EVENT:

On February 11, 1988, the quarterly Component Cooling Water (CCW) Train 1B valve operability test was performed. Review by the Test Coordinator and the Shift Supervisor for valve stroke time limits showed acceptable results, and the package was forwarded for review. Existing processing procedures require the System Engineer to review the completed surveillance package and perform an ASME Section XI stroke time change evaluation. The System Engineer was unaware that the test had been performed and that the results needed to be reviewed. Upon notification by the Divisional Surveillance Coordinator in mid-May that the status of this test package had not been updated to indicate completion of the review cycle, the System Engineer obtained the package and performed the required evaluation.

On May 18, 1988, the System Engineer's stroke time change evaluation for one of the valves covered by the test (the RHR Heat Exchanger Outlet Valve) revealed an increase in stroke time which required an increase to monthly surveillance frequency per ASME Section XI requirements. However, due to the lack of timely review, two required surveillances had already been missed. The surveillance frequency was increased to monthly, starting from the latest available valve operability surveillance for CCW Train 1B, which had been performed on May 13, 1988. The operability of the valve of concern was verified based on May 13, 1988, valve operability surveillance; therefore, no Limiting Condition of Operation was entered.

The NRC was notified of this reportable condition at 0738 hours on May 19, 1988.

CAUSE OF EVENT:

The root cause of this occurrence was an inadequate procedure for tracking surveillance test packages through the review cycle. The existing program did not have sufficient internal controls to ensure test packages were reviewed in a timely manner.

ANALYSIS OF EVENT:

There were no adverse safety or radiological consequences from this event. The Inservice Testing Program (IST) for valves requires an increase in test frequency whenever the stroke increases by a given percentage from one test to the next, even though the actual stroke time may still be less than the maximum allowed by Technical Specifications. Although the increase in valve stroke time was greater than the allowable percentage, it was within the required response time, and the valve was still capable of performing its safety function. The event did not produce any additional risk to the public.

This event was reportable pursuant to 10CFR50.73(a)(2)(i)(B). One valve in CCW Train 1B was in an untested condition from March 21, 1988, to May 13, 1988, and, as such, the plant was in a configuration prohibited by Technical Specifications. The Component Cooling Water Train 1B valve operability test was satisfactorily completed on May 13, 1988.

CORRECTIVE ACTIONS:

1. The most recent surveillance results for the valve of concern were reviewed. Valve operability and proper surveillance frequency were verified.

2. ASME Section XI surveillance test packages performed prior to May 6, 1988, which were in the final review and approval cycle have been checked to ensure that surveillance frequencies were correct. No additional discrepancies were discovered.

3. All ASME Section XI pump and valve surveillance test packages are reviewed by the Section XI IST Coordinator. Requests for increased frequency testing are initiated following this review for pumps with parameters in the alert range and for valves exceeding the trend limits. A second review of the surveillance packages is conducted by the system engineers. The review of test packages by the IST coordinator and the subsequent review and evaluation of the packages by the cognizant system engineer will ensure that appropriate corrective actions are implemented.

4. The Surveillance Scheduling Procedure has been revised to require the Plant Surveillance Coordinator to periodically generate a report containing pump and valve surveillance test packages whose review has not been completed within two weeks from their performance. The Plant Surveillance Coordinator distributes copies of this report to individual(s) currently responsible for the review status of the packages, their supervision and the appropriate Divisional Surveillance Coordinator(s).

5. HL&P's Independent Safety Engineering Group (ISEG) has performed a review of the interface between the ASME Section XI Pump and Valve program and the surveillance program with no adverse findings.

ADDITIONAL INFORMATION:

Similar events were previously reported at Unit 1 via LER 88-011, which involved nonperformance of a scheduled surveillance test on an Essential Chilled Water Pump, and via LER 88-023, which involved a failure to increase the surveillance frequency on an Essential Cooling Water Screen Wash Booster Pump.