

The Light company

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

October 09, 1992
ST-HL-AE-4228
File No.: G02.04
10CFR2.201

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Reply to Notice of Violation 9224-01
Regarding Failure to Take Prompt Corrective Action
Regarding Essential Chiller Differential Pressure Switches

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9224-01 dated September 10, 1992, and submits the attached reply.

If you 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
General Manager,
Nuclear Licensing

RAD/ag

Attachment: Reply to Notice of Violation 9224-01

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A Subsidiary of Houston Industries Incorporated

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Revised 10/11/91

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I. Statement of Violation:

Inadequate Corrective Actions

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. This is accomplished, in part, by Interdepartmental Procedure IP-1.45Q, "Station Problem Reporting."

Station Problem Report 920013 identified that cautions were determined to be required, as a minimum, to reduce the chances of essential chilled water flow switch [sic] malfunction during the valving in process following maintenance.

Contrary to the above, on July 17, 1992, the licensee had not incorporated the required cautions into the applicable maintenance program procedures even though this action was identified in May 1992. The corrective action was not taken because of a miscommunication as to which department was going to take responsibility for completion of the assigned activities.

This is a Severity Level IV violation (Supplement I) (498;499/9224-01)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The cause of the failure to promptly incorporate the precautions in the Preventive Maintenance (PM) instructions was ineffective communications. The memorandum which addressed the engineering recommendation to add the precautions was not sent to the Maintenance Department. In addition, the Maintenance Feedback Request (MFR) which was initiated by engineering to address the recommendation did not contain sufficient detail.

A contributing cause was inadequate maintenance procedures for processing MFRs. The procedure did not specify the mechanism for processing MFRs involving corrective action items. Additionally, the procedure did not require that the responsible department obtain concurrence from the initiator prior to rejecting an MFR.

IV: Corrective Actions:

The following actions have been taken to prevent recurrence:

1. The applicable preventive maintenance activities have been revised to add necessary precautions.
2. A design change to install isolation/equalization valves to facilitate calibration and subsequent restoration of the essential chiller differential pressure switches will be implemented by December 31, 1993.
3. The Preventive Maintenance Program procedure OPGP03-ZM-0002 will be revised to include requirements on obtaining the initiating departments concurrence prior to rejection of an MFR associated with corrective actions. This action will be completed by December 31, 1992.
4. The Corrective Action Program procedure OPGP03-ZX-0002 will be revised to include guidance on the expectations for correspondence involving Station Problem Report (SPR) corrective actions. This action will be completed by December 31, 1992.

V. Date of Full Compliance:

HL&P is in full compliance at this time. Enhancements to the preventive maintenance and corrective action programs will be implemented by December 31, 1992.