

APPENDIX A  
NOTICE OF VIOLATION

Houston Lighting and Power  
South Texas Project Units 1 & 2

Docket: 50-498/499  
Permit: CPPR 128/129

During an NRC inspection conducted May 13-24, 1985, and May 28-31, 1985, two violations of NRC requirements were identified. The violations involved failure to follow approved procedures and failure to have approved procedures for activities affecting quality. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

1. Failure to Properly Follow Procedure

Criterion V of Appendix B to 10 CFR Part 50 required that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings. This requirement is part of the approved QAPD (Quality Assurance Plan Description) for South Texas Project, Section 5.

Procedures PGP-ZM-1, ASP-23 and QCP-12.1 require "recording of the identification and dates of all items inspected or tested with M&TE be recorded on the "Tool Data Issue/Record Card" - to provide traceability.

Contrary to the above, the NRC inspector observed instances when no information was recorded or improperly noted in the record section.

Procedure PGP 3-ZM-1 requires test equipment returned prior to being recalled to have the calibration sticker removed and a white dot attached.

Contrary to the above, the NRC inspector observed the laboratory M&TE calibration clerk attaching form (-5)s to all items irrespective of whether the item was recalled, damaged or returned prior to recall.

Procedures ASP-23 and QCP-12.1 require M&TE be returned to the calibration laboratory prior to expiration of calibration period or if sticker indicates equipment period has expired, equipment will be immediately returned to calibration laboratory.

Contrary to the above M&TE ST-CC-3173 and ST-CC-3174 were not returned until 8 days and 12 days, after their respective dates.

Procedure PGP 3-ZM-1 required that equipment requiring calibration be listed in the calibration schedule.

Contrary to the above, test equipment ST-CC-3173 was not listed in the

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calibration schedule.

This is a Severity Level IV Violation. (10 CFR part 2 Supplement IE) (498/499-8507-01).

2. Failure to have Approved Procedures

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings. This requirement is part of the approved QAPD (Quality Assurance Plan Description) for South Texas Project, Section 5.

Contrary to the above, the Metrology and Test Equipment Laboratory is using a "check-in/out" log and a "past due tracking log." Neither of these logs are addressed in approved procedures which explains their purpose, responsibilities or actions to be taken in the use of these logs.

This is a Severity Level IV Violation. (10 CFR Part 2 Supplement IE) (498/499-8507-02).

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved; (3) corrective steps which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Date at Arlington, Texas  
this 25th day of July 1985.