

FEB 9 1988

In Reply Refer To:  
Dockets: 50-498/87-70  
50-499/87-70

Houston Lighting & Power Company  
ATTN: J. H. Goldberg, Group Vice  
President, Nuclear  
P.O. Box 1700  
Houston, Texas 77001

Gentlemen:

Thank you for your letter of January 13, 1988, in response to our letter and Notice of Violation dated December 17, 1987. 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,

Original Signed By  
A. B. Beach

L. J. Callan, Director  
Division of Reactor Projects

cc:  
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CJohnson:gb  
02/05/88

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2/4/88

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LJCallan  
2/8/88

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Houston Lighting and Power Company

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cc cont.:

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City Public Service Board  
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Texas Radiation Control Program Director

bcc to DMB (IE01)

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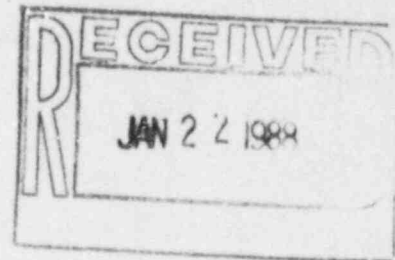
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# The Light company

Houston Lighting & Power

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January 13, 1988  
ST-HL-AE-2445  
File No.: G2.4  
10CFR2.201

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

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Response to Notice of Violation

Houston Lighting & Power Company has reviewed Notice of Violation 87-70-01 dated December 17, 1987 and submits the attached response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Mr. J. S. Phelps at (512) 972-7071.

*J. H. Goldberg*  
J. H. Goldberg  
Group Vice President, Nuclear

JSP/hg

Attachment: Response to Notice of Violation 87-70-01

~~87-70-01~~ 5 pp.

A Subsidiary of Houston Industries Incorporated

L4/NRC/mm

IC-88-020

Houston Lighting & Power Company

ST-HL-AE-2445  
File No.: G2.4  
Page 2

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Revised 11/20/87

Response to Notice of Violation 87-70-01

I. Statement of Violation

An NRC Inspection conducted from October 19, 1987 to November 20, 1987, identified a violation of NRC requirements. The violation involved a failure to follow procedures.

" Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be prescribed by and accomplished with appropriate instructions, procedures, or drawings. This requirement is amplified by the approved Quality Assurance Program Description (QAPD) of South Texas Project (STP).

Standard Site Procedure (SSP) 16, Revision 3, paragraph 4.3.3, states that 'The craft supervisor and/or discipline Field Engineer shall be responsible to ensure that the latest design drawings and amendments are used to perform work.'

Specification 3A010SS0030, Revision 9, paragraph 7.2.2.1, states that 'Welds shall be as shown on the drawings unless otherwise reviewed and accepted by the engineer'.

Contrary to the above, during an inspection of the Unit 2 control room ceiling structural steel, a Class 9 penetration cover plate was welded to a Class 3 structural channel beam which was not in accordance with design drawings and field change request (FCR) BC-0-2780 and was not reviewed or accepted by engineering.

This is a Severity Level IV violation."

II. Reason for Violation

The root causes of this deficiency have been determined to be as follows:

- o Lack of attention to detail on the part of the craft foreman in laying out the work for his crew.
- o After the installation was completed, the craft foreman identified the deviation from the design drawings and notified the Field Engineer. The Field Engineer failed to recognize the need to document the problem by issuing a Nonconformance Report (NCR).

III. Corrective Actions Taken and Results Achieved

A review of the design details for non-safety-related civil/structural attachments to Category I (Class 3) structural steel in Unit 2 was performed. Non-safety-related Civil/Structural installations in



Category I areas are typically limited to the following types:

- o Handrail and toeplate
- o Checker plate and grating including support angles
- o Ladders and cages
- o Stair treads
- o Penetration closure plates
- c Miscellaneous platforms

Except for penetration closure plates, the other types of installations listed above have specific design authorization for attachment to Category I steel. Typical details for installations of grating call for attachment to Category I steel utilizing welded studs with clips. Checker plate may be welded or bolted, depending on the specific details. Handrail and toeplate, stair treads, miscellaneous platforms, and ladders and cages are detailed to be welded to Category I structural steel and/or embeds.

Penetration closure plate details do not include provisions for attachment to Category I structures other than by expansion anchors to concrete or welding to embedded angle frames.

A representative sample of non-safety-related Civil/Structural installations in Category I areas (as described above) has been reinspected. No unauthorized attachments to Category I structural steel were found. The sample was representative of all buildings in the Unit 2 power block. Special emphasis was given to penetration closure plates; all installations with which the field engineers and ironworker foreman were involved were identified and reinspected.

The sample consisted of over 500 individual attachments to Category I structural steel in addition to the grating and checker plate. Grating was verified to have been installed utilizing authorized clips. Additionally, the underside of the grating was examined for unauthorized welding to the edge of beam flanges. Grating examined utilized authorized clips; no unauthorized attachments were found.

Overall, the reinspection identified no unauthorized attachments in any of the categories listed above.

In addition to the above sample, a surveillance into the cited violation was performed. The surveillance consisted of a review of the design details for non-safety-related Civil/Structural attachments to Category I structures, partial reinspection of installed attachments to Category I structural steel in accordance with design details and an interview of structural field engineers to determine if they have any knowledge of other unauthorized attachments. No additional unauthorized attachments were identified.

The specific deficiency cited by the NRC inspector has been documented on a nonconformance report and dispositioned "use-as-is"; the structural adequacy of safety-related steel was not affected by the attachment.

IV. Corrective Steps Taken To Avoid Further Violation

As a result of this violation, the personnel involved received immediate reinstruction concerning attention to details on design documents and adherence to the design requirements. This was followed up with a documented reinstruction of structural foremen/general foremen involved in installations of this type.

Additionally, structural field engineers involved in installations of this type have received formal reinstruction per standard site procedures with emphasis on the need to report unauthorized attachments to Category I structural steel.

V. Date of Full Compliance

STP is currently in full compliance.