

In Reply Refer To:
Dockets: 50-498/87-64
50-499/87-64

FEB 9 1988

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 15, 1988, in response to our letter and Notice of Violation dated December 16, 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:
Houston Lighting & Power Company
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Houston Lighting & Power Company
ATTN: Gerald E. Vaughn, Vice President
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CJohnson:gb
2/9/88

DRP/D
GLConstable
2/9/88

DRP/D
LJCallan
2/9/88

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Houston Lighting and Power Company 2

cc cont:
Central Power & Light Company
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P.O. Box 2121
Corpus Christi, Texas 78403

City Public Service Board
ATTN: R. J. Costello/M. T. Hardt
P.O. Box 1771
San Antonio, Texas 78296

City of Austin
ATTN: M. B. Lee/J. E. Malaski
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Texas Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:

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*RIV File
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*R. Hall
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The Light company

Houston Lighting & Power

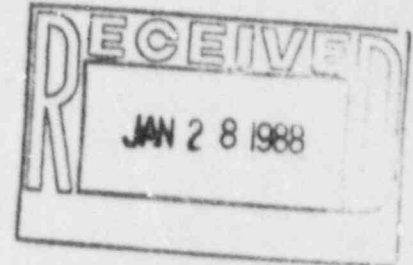
P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

January 15, 1988

ST-HL-AE-2477

File No.: G2.4

10CFR2.201



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

South Texas Project Electric Generating Station
Unit 1

Docket No. STN 50-498

Response to Notice of Violation 8764-01

Houston Lighting & Power Company has reviewed Notice of Violation 8764-01 dated December 16, 1987 and submits the attached response pursuant to 10CFR 2.201.

If you should have any questions on this matter, please contact Mr. S.M. Head at (512) 972-8392.

A handwritten signature in cursive script, appearing to read "G. E. Vaughn".

G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/SMH/lzs

Attachment: Response to Notice of Violation 8764-01

~~8801210100~~ 5pp.

NL.RESP.NOTICE

A Subsidiary of Houston Industries Incorporated

IC-84-025

Houston Lighting & Power Company

ST-HL-AE-2477
File No.: G2.4
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cc:

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Revised 11/20/87

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-498
Response to Notice of Violation (498/8764-01)

I. Statement of Violation

Failure To Follow The Approved Procedure For Performing Plant Operation

South Texas Project Electric Generating Station (STPEGS) Technical Specifications (TS), Section 6.0 (Administrative Controls), Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained for plant operations. Plant Procedure OPGP03-ZO-0004 implements the requirements of this TS.

Contrary to the above, a chemical operations boric acid mixing activity was observed by the NRC inspector in which the chemical operator was not following the procedure (1PCP13-PF-0001) as written, in that he was not performing all procedural steps. Additionally, the boric acid mixing procedure requires verification that the boric acid batching valve lineup checklist is in effect prior to mixing operations. No objective evidence was available that this lineup checklist had been performed and was in effect.

II. Reason for Violation

Since boric acid batching is a routine evolution involving relatively simple operator tasks, plant procedures do not require that operators have a copy of the procedure (1PCP13-PF-0001) in their possession while the evolution is in progress. Operators are responsible for performing steps in sequence as written in the procedure even though a copy is not present. At the time of the violation, although an approved procedure was present, the operator was not verifying every step against the procedure. Due to inattentiveness on the part of the assigned operator and lack of complete understanding of the requirements of procedural compliance, two steps were not performed.

A review of the Records Management System indicated that the most recent boric acid batching lineup check list had been forwarded to the Operations Document Control Center (ODCC). This check list was not in the Chemical Operations system status file and hence, contrary to procedural requirement, the checklist was not physically verified by the operator. Due to a lack of understanding of the need for objective evidence to verify lineup status, the procedural requirement to verify the boric acid batching lineup checklist was not satisfied.

III. Corrective Action Taken and Results Achieved

HL&P has taken or will take the following actions to correct the conditions resulting in the violation:

1. The chemical operator was immediately relieved.
2. The chemical operator involved was verbally counselled concerning the requirements to follow procedures.
3. The boric acid batching lineup was reperformed and the lineup checklist was placed in the Chemical Operations Foreman files.
4. Chemical operators were provided an extensive briefing covering the Conduct of Operations which specifically addressed:
 - a. verbatim compliance with procedures
 - b. system lineup checklist retention requirements
5. Chemical operations procedures were reevaluated to determine whether they needed to be on station during performance. Direction has been subsequently issued specifying those procedures necessary to be physically present and used to assure compliance.
6. Copies of the current chemical operations system lineup check lists have been obtained from ODCC and are located in the chemical operations system status file. In addition, chemical operations quality related system lineups will be reperformed in order to update the chemical operations system status files.

IV. Corrective Steps Taken to Prevent Recurrence

HL&P is currently taking the following actions to prevent recurrence of the conditions resulting in the violation.

1. Briefings of Chemical Operators have been completed for 44 of 54 individuals. Most of the chemical operators employed at the time of this violation have been briefed. Eight of the newly hired chemical operators and two operators employed at the time of the violation still need to be briefed. Remaining briefings shall be completed prior to February 1, 1988.
2. Of the 28 chemical operations quality related system lineups at STP, 24 have been verified. The remainder (pending valve accessibility) shall be completed prior to February 1, 1988.
3. HL&P will revise Chemical Operations and Plant Operations procedures prior to July 1, 1988, to provide a better mechanism for the operators to status what steps have been performed during an evolution.

V. Date of Full Compliance

STPEGS will be in full compliance by February 1, 1988. Additional preventive measures will be completed by July 1, 1988.