

# The Light company

Houston Lighting & Power

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File No.: G02.04  
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 498/8830-01

Houston Lighting & Power Company has reviewed Notice of Violation 498/8830-01 dated June 20, 1988, and submits the attached response pursuant to 10CFR2.201.

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

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J. H. Goldberg  
Group Vice President  
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A Subsidiary of Houston Industries Incorporated

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I. Statement of Violation

Paragraph (f) of 10CFR50.49 requires that qualification of each component must be based on testing or experience with identical equipment or with similar equipment with a supporting analysis to show that the equipment to be qualified is acceptable.

Paragraph (k) of 10CFR50.49 requires that equipment previously required by the Commission to be qualified to NUREG-0588 (For Comment Version), "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment" need not be requalified.

Paragraph 5(1) of NUREG-0588 required that the qualification documentation shall verify that each type of electrical equipment is qualified for its application and meets its specified performance requirements. The basis of qualification shall be explained to show the relationship of all facets of proof needed to support adequacy of the complete equipment. Data used to demonstrate the qualification of the equipment shall be pertinent to the application and organized in an auditable form.

Contrary to paragraphs (f) and (k) of 10CFR50.49, and Section 5(1) of NUREG-0588, Category I, the HL&P/Bechtel equipment qualification (EQ) documentation file for valve operator assembly Model No. PF 89270-500 (PORV which includes the hydraulic cylinder and hydraulic pump), did not adequately support qualification in that similarity between the type test configuration and that installed in the STP plant, Unit 1, could not be established. Specifically, no analysis was available to demonstrate that Buna-N (nitrile rubber) seal materials are acceptable for an accident environment which may exist at the PORV.

II. Houston Lighting & Power Position

HL&P concurs that the cited violation occurred.

III. Reason for Violation

The root cause of the violation was an oversight by personnel involved in preparing the Justification for Continued Operation (JCO) in that the requirements of an existing procedure, IP-3.20Q, "10CFR50.59 Evaluations", were not completely followed. This resulted in the failure to address in the JCO the Equipment Qualification (EQ) impact of substitution of Buna-N material in lieu of material allowed in the EQ test report. This JCO included the Unreviewed Safety Question (USQ) evaluation performed when the Buna-N material was discovered. IP-3.20Q, which defines the procedure for conducting 10CFR50.59 reviews (USQ determinations), specifically requires consideration of equipment qualification.

IV. Corrective Action Taken and Results Achieved

1. During the NRC audit on the subject violation, HL&P prepared an addendum to the USQ evaluation on the Power Operated Relief Valves (PORV's) with a revised JCO. This JCO concluded that the Buna-N material was qualified and would not compromise the operation of the PORV's in the expected accident environment.
2. The Unit 1 PORV's have had the incompatible Buna-N material removed, hydraulic system drained and flushed and been refurbished with the proper seal material. Subsequent to the refurbishment, filter assemblies were replaced on all Unit 1 PORVs with assemblies obtained from the warehouse. While assembling documentation for close-out of the Problem Report, it was found that these filter assemblies and other parts in the warehouse had not been replaced or evaluated for acceptability. Since the installed filter assembly seals are indeterminate, another JCO was written and concluded that the PORVs are operable. All seal kits and parts with wetted seals in the warehouse have been put on hold for engineering disposition. The installed filter assemblies will be replaced with acceptable seals by August 31, 1988.

V. Corrective Action Taken to Prevent Recurrence

Appropriate personnel have received training on IP-3.20Q regarding USQ determinations for use in preparing JCO's per 10CFR50.49.

In addition, appropriate personnel have been informed of the importance and received copies of NRC Generic Letter 88-07, "Modified Enforcement Policy Relating to 10CFR50.49, 'Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants'".

VI. Date of Full Compliance

The current JCO addresses environmental qualification; therefore, HL&P is in full compliance at this time.