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Houston Lighting & Power

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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
Revised Response to Violation 8809-06

As stated in telephone conversations held on May 23, 1988 and in response to your letter dated June 28, 1988, HL&P submits the attached revised response to Notice of Violation 8809-06.

If you should have any questions on this matter, please contact Mr. M.A. McBurnett at (512) 972-8530.

G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/RAF/nl

Attachment: Revised Response to Notice of Violation 8809-06

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cc:

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South Texas Project Electric Generating Station
Unit 1
Docket No STN 50-498
Response to Notice of Violation 8809-06

I Statement of Violation

Test Procedure Adequacy and Implementation

Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, on January 26, 1988, the licensee failed to reestablish the proper testing configuration as required by the note in Section 4.7 of Station Procedure 1TEP07-AF-0010, Revision 0, "Auxiliary Feedwater Proof Test," after interrupting the test to feed steam generators. This resulted in obtaining improper test results requiring a repeat of the test. On February 5, 1988, the licensee implemented an inadequate procedure. Station Procedure 1PEP04-ZL-0024, Revision 3, "Rod Drop Time Measurement" did not provide for closing the reactor trip breakers, nor did the procedure provide controls to ensure that the same breakers were opened upon recovering from the test.

II. Houston Lighting & Power Position

Houston Lighting & Power does not contest the violation.

III. Reason for Violation

The discrepancy identified during the conduct of the Auxiliary Feedwater Proof Test is attributed to inattention to detail on the part of the test coordinator.

The lack of control associated with the reactor trip breakers in procedure 1PEP04-ZL-0024, Rod Drop Time Measurement, was caused by an inadequate review during the generation and approval cycle, in that it was believed that the reactor trip breakers were operated as part of the procedure for starting/securing the Rod Control System Motor Generator sets. If this had been true the prerequisite section would have ensured the breakers closed and the breakers would have been opened when the Shift Supervisors secured the M/G set after being informed that the testing had been completed.

IV. Corrective Actions That Have Been Taken

Procedure 1TEP07-AF-0010, Auxiliary Feedwater Proof Test was reperformed.

Procedure 1PEP04-ZL-0024, Rod Drop Time Measurement, was changed to incorporate specific steps to control the position of the reactor trip breakers. This was done to provide consistency between various plant procedures.

V. Corrective Actions That Will Be Taken

No further corrective actions are deemed necessary.

VI Full Compliance

The plant is in full compliance.