COMPANY Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

December 23, 1985 ST-HL-AE-1553 File No.: G12.284

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Mr. Robert D. Martin Regional Administrator, Region IV U. S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

> South Texas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Final Report Concerning Valve Installation Process Documentation

Dear Mr. Martin:

The Light

On September 13, 1985, Houston Lighting & Power (HL&P) notified your office, pursuant to 10CFR50.55(e), of a potentially reportable item concerning the process of valve installation. Enclosed is the final report concerning this item.

If you should have any questions on this matter, please contact Mr. M. E. Powell at (713) 993-1328.

Very truly yours,

J. H. Goldberg

Group Vice President, Nuclear

PCL/yd

Attachment: Final Report Concerning Valve Installation Process Documentation

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Houston Lighting & Power Company

cc:

Hugh L. Thompson, Jr., Director Division of PWR Licensing - A Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washing on, DC 20555

N. Prasad Adambi, Project Manager U.S. Nuclear Regulatory Commission 7920 Norfolk Avenue Bethesda, MD 20814

Claude E. Johnson Senior Resident Inspector/STP c/o U.S. Nuclear Regulatory Commission P.O. Box 910 Bay City, TX 77414

M.D. Schwarz, Jr., Esquire Baker & Botts One Shell Plaza Houston, TX 77002

J.R. Newman, Esquire Newman & Holtzinger, P.C. 1615 L Street, N.W. Washington, DC 20036

Director, Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission Washington, DC 20555

T.V. Shockley/R.L. Range Central Power & Light Company P.O. Box 2121 Corpus Christi, TX 78403

H.L. Peterson/G. Pokorny City of Austin P.O. Box 1088 Austin, TX 78767

J.B. Poston/A. vonRosenberg City Public Service Board P.O. Box 1771 San Antonio, TX 78296 ST-HL-AE-1553 File No.: Gl2.284 Page 2

Brian E. Berwick, Esquire Assistant Attorney General for the State of Texas P.O. Box 12548, Capitol Station Austin, TX 78711

Lanny A. Sinkin Christic Institute 1324 North Capitol Street Washington, DC 20002

Oreste R. Pirfo, Esquire Hearing Attorney Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, DC 20555

Charles Bechhoefer, Esquire Chairman, Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

Dr. James C. Lamb, III 313 Woodhaven Road Chapel Hill, NC 27514

Judge Frederick J. Shon Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

Mr. Ray Goldstein, Esquire 1001 Vaughn Building 807 Brazos Austin, TX 78701

Citizens for Equitable Utilities, Inc. c/o Ms. Peggy Buchorn Route 1, Box 1684 Brazoria, TX 77422

Docketing & Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, DC 20555 (3 Copies)

Advisory Committee on Reactor Safeguards U.S. Nuclear Regulatory Commission 1717 H Street Washington, DC 20555

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South Texas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Final Report Concerning Valve Installation Process Documentation

I. Summary

On September 13, 1985 Houston Lighting & Power (HL&P) notified your office, pursuant to 10CFR50.55(e), of a potentially reportable item concerning the process of valve installation. Some of the valves for which the vendors' recommend valve disassembly prior to welding may have been welded without such disassembly. This resulted from there being no mechanism to advise Construction of the changes in the welding prerequisites for Engineering-authorized substitutions of valves.

Documentation of in-process valve installation was reviewed and corrected. A sampling plan for the review of documentation for the installed valves has been developed. No damage to any valve due to this deficiency has been identified.

II. Description of Deficiency

During the surveillance of valve installation activities it was identified that documented evidence of compliance with the vendors' recommendation for valve disassembly prior to welding was not available for some of the valves.

Using the technical information on the Valve Master File list (VMFL), Construction developed and issued to the field the Process Data Check lists (PDC) prior to issuance of the valves. During the issuance of the valves from the warehouse, Engineering approved substitutions with certain types of valves for which the vendors recommend valve disassembly prior to welding. However, the procedures did not exist to alert Construction of the changes in the welding prerequisites for some of these substituted valves. This may have resulted in the installation of some valves without disassembly prior to welding.

III. Corrective Action

All PDCs involving welding which were in-process and/or in-storage were retrieved and reviewed against the Valve Control Card (VCC) and VMFL. Any discrepancies found were corrected. PDCs requiring correction were placed on hold.

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The documentation for installed valves will be reviewed for verification that the valves required to be disassembled prior to welding were in fact disassembled. A sampling plan has been developed to determine the population, sample size, and accept/reject criteria. The hardware deficiencies identified by this review will be dispositioned appropriately. The review is scheduled to be completed by April 20, 1986.

IV. Recurrence Control

The procedures have been revised to require issuance of the valve and a copy of the VCC prior to preparation of the applicable PDC. The VCC will be reviewed against the VMFL and included in the welding package.

The welding documentation form has been revised to include all purchase order numbers for the valves to be disassembled prior to welding.

The Construction and Quality Control personnel were reinstructed on the use and importance of VCC. Disassembly of the valves, when required, has been established as a hold point for Quality Control verification and documentation.

The changes in the procedures along with the emphasis on Quality Control documentation for disassembly will preclude any recurrence of similar deficiencies.

V. Safety Analysis

Had this deficiency remained uncorrected one or more safety-related valves may not have performed as required due to overstress during installation. Due to the extensive nature of the investigation to determine if any valves have not been installed according to vendor recommendations we have determined that this item is reportable pursuant to 10CFR50.55(e).