

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project (STP), Unit 1

Docket: 50-498
Operating License: NPF-76

During an NRC inspection conducted on June 130, 1988, three violations of NRC requirements were identified. The first violation involved failure to perform surveillances in accordance with the Technical Specifications. The second violation involved failure to meet the Technical Specifications limiting condition for operation action statement regarding the release of liquid effluents. The third violation involved the plant changing modes prior to the completion of required surveillances. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, and the licensee's approved Quality Assurance Plan require that activities shall be prescribed by documented instructions, procedures, or drawings. South Texas Project Procedure OPGP03-ZE-0021, Revision 3, "Inservice Testing Program for Valves," requires the cognizant system engineer to calculate the stroke time change from previous tests regarding power operated valves and to increase the test frequency to monthly for those valves for which the measured stroke time indicates an increase of greater than 25 percent over the previous test.

Contrary to the above, monthly testing of Motor Operated Valve (MOV) FV-4548 was not performed until after May 18, 1988, notwithstanding that a stroke time test for MOV FV-4548 performed on February 11, 1988, indicated a measured stroke time increase of greater than 25 percent over the previous test for MOV FV-4548.

This is a Severity Level IV violation. (Supplement I)(498/8839-01)

- B. Technical Specification 3.3.3.10, Table 3.3-12, action statement 43 states that effluent releases may continue with the liquid waste processing discharge monitor inoperable, provided two independent samples are analyzed in accordance with Technical Specification 4.11.1.1 and at least two technically qualified members of the staff independently verify the release rate calculation and discharge line valving.

Contrary to the above on June 7, 1988, with the Liquid Waste Processing Discharge Monitor (RT-8038) inoperable, an unplanned release of approximately 1500 gallons of unsampled radwaste occurred because of incorrect valve lineups by licensee personnel. The incorrect valve lineup led to the partial discharge of a tank not intended for release.

This is a Severity Level IV violation. (Supplement I)(498/8839-02)

- C. Technical Specification 4.0.4 states, in part, that entry into an operational mode shall not be made unless the surveillance requirements associated with the limiting condition for operation have been performed within the stated surveillance interval.

Technical Specification Surveillance Requirement 4.3.1.1, Table 4.3-1, requires that an Intermediate Range, Neutron Flux Analog Channel Operational Test be performed within the previous 31 days.

Contrary to the above, on June 13, 1988, Mode 2 was entered prior to the Intermediate Range Nuclear Instruments having an Analog Channel Operational test performed within 31 days as required by Technical Specification section 4.3.1.1.

This is a Severity Level IV violation. (Supplement I)(498/8839-03)

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *12th* day of *August*, 1988