

APPENDIX A
NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project (STP), Units 1 and 2

Dockets: 50-498
50-499
Operating License: NPF-76
Construction Permit: CPPR-129

During an NRC inspection conducted on July 1-31, two violations of NRC requirements were identified. One violation involved failure to perform surveillances in accordance with the Technical Specifications. The second violation involved a failure to meet requirements for maintaining the nitrogen gas pressure on electrical penetrations in Unit 2 after the equipment had been turned over from construction to the licensee operations department. 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. Technical Specification (TS) Surveillance Requirement 4.0.1 states, in part, surveillance requirements shall be met during the operational modes or other conditions specified for individual limiting conditions for operations. TS Surveillance Requirement 4.3.1.1.20 requires that the reactor trip breaker trip actuating device operational test be performed on a staggered test basis. TS Surveillance Requirement 4.8.1.1.2.d requires verification of the total particulate contamination of the fuel oil for each standby diesel generator at least once every 31 days.

Contrary to the above, on June 23, 1988, the licensee discovered that the surveillance test for the under voltage and shunt trip devices of the reactor trip breakers did not meet the staggered test basis requirement of TS Surveillance Requirement 4.3.1.1.20 between June 20 and June 23, 1988. On July 12, 1988, the licensee discovered that the 31 day check of fuel oil contamination for the No. 11 Diesel Generator Fuel Oil Storage Tank required by TS Surveillance Requirements 4.8.1.1.2.d had been missed.

This is a Severity Level IV violation (Supplement I) (498/8849-01).

- B. 10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. This requirement is amplified by the approved Quality Assurance Program Description of the South Texas Project.

Contrary to the above, a procedure to maintain nitrogen gas pressure for electrical penetration assemblies did not exist and nitrogen gas pressure was not maintained for Electrical Penetration Assemblies 46, 47, 48, and 49 in the Unit 2 Electrical Auxiliary Building between March 31, 1988 and July 1, 1988.

This is a Severity Level IV violation (Supplement II) (499/8847-02).

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PDR ADOCK 05000498
Q PDC

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 violation(s) 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 caused is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *31st* day of *August*, 1988