In Reply Refer To: Docket: 50-499/88-24

Houston Lighting & Power Company ATTN: J. H. Goldberg, Group Vice President, Nuclear P.O. Box 1700 Houston, Texas 77001

Gentlemen:

Thank you for your letter of July 8, 1988, in response to our letter and attached Notice of Violation dated June 7, 1988.

We have reviewed your reply and do not agree with your exception to Violation 499/8824-01. Your response stated that the specific tags cited by the NRC inspectors were not the type of tags that are governed by Plant Procedures 2TGP03-ZB-0002 and OTGP03-ZB-0001. This was discussed with members of your staff on several occasions. During these discussions, they indicated that the temporary tags of the nature found by the NRC inspectors were used for informal purposes or to define jurisdictional boundaries.

The tags observed by the NRC inspectors appeared to identify equipment and component status and convey status information. For this reason, we believe there was inadequate adminintrative control regarding documentation of equipment and component status when Violation 499/8824-01 was cited. Additional examples regarding equipment status indication (a high radiation alarm, 4160V switchgear and battery charging equipment) are reported in NRC Inspection Report 50-493/88-47; 50-499/88-47, paragraph 7, dated August 31, 1988.

As a result of our review, we find that additional information, as discussed with your Mr. M. F. Polishak during a telephone call on September 7, 1988, is needed. Specifically, the use of Plant Procedures and the procedures used to control information regarding the status of equipment and components should be addressed.

Please provide the supplemental information within 30 days of the date of this letter.

Sincerely,

Original Signed By:

A. B. BEACH

L. J. Callan, Director
Division of Reactor Projects

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cc: (see next page)

*RIV:C:PSD EJHoller;df 9/ /88 D (PAN) LJC 11 ah 9/19 /88

*Previously concurred

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cc:

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City of Austin Electric Utility ATTN: R. J. Miner, Chief Operating Officer 721 Barton Springs Road Austin, Texas 78704

Texas Radiation Control Program Director

bcc to DMB (IEO1)

bcc distrib. by RIV: DRP R. D. Martin, RA Section Chief (DRP/D) MIS System Lisa Shea, RM/ALF R. Gachmann, OGC Project Engineer, DRP/D Newman & Holtzinger, P.C. ATTN: J. R. Newman, Esquire 1615 L Street, N.W. Washington, D.C. 20036

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