

The Light company

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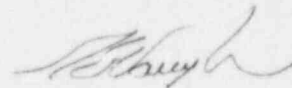
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-498
Response to Notice of Violation 8817-01

HL&P has reviewed the Notice of Violation included in Inspection Report 88-17 and submits the attached response pursuant to 10CFR Part 2.

If you have any questions, please contact Mr. S.M. Head at (512) 972-8392.



G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/RAF/rl

Attachment: Response to Notice of Violation 8817-01

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A Subsidiary of Houston Industries Incorporated

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Unit 1
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Response to Notice of Violation 8817-01

I. Statement of Violation

Inadequate Maintenance of Control Room Logs

Unit 1 Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33 (Revision 2). Item 1.h of Appendix A to Regulatory Guide 1.33 requires procedures relating to log entries.

Licensee Procedure OPOP01-ZQ-0030 establishes the log entry requirements. Section 6.2 and 6.3 of OPOP01-ZQ-0030 require that entries be made in the reactor operator and the unit supervisor log books including "entry into or exit from Technical Specification Action Statements."

Contrary to the above, the NRC inspectors found, on March 3, 1988, that the unit supervisor log and the reactor operator log for the time period of February 29 through March 3, 1988, noted several entries into LCO conditions which had been logged into one of the two logs, but not in both logs.

II. Houston Lighting & Power Position

HL&P does not contest the violation.

III. Reason for Violation

The root causes of this violation are:

1. An unnecessary requirement to maintain two operations logs in the control room recording the same or similar information and
2. An inadequate controlling document in that all log entries cited in procedure OPOP01-ZQ-0030, Maintenance of Plant Operations Logbooks, are 'typical' which allows for too much latitude in entries.

IV. Corrective actions that have been taken

1. Procedure OPOP01-ZQ-0030 has been revised to eliminate the use of dual logbooks. The Unit Supervisor and Reactor Operator Logbooks have been combined into what is now referred to as the Control Room Logbook. This logbook is maintained by the Reactor Operator.
2. The present logkeeping requirements have been evaluated to determine changes which will improve logkeeping practices.

V. Corrective action that will be taken

1. Procedure OPOP01-ZQ-0030, Maintenance of Plant Operations Logbooks will be revised to incorporate the changes recommended in item IV 2 by June 6, 1988.

VI. Full Compliance

The plant is in full compliance. The actions being taken in section V are considered enhancements to prevent recurrence.