

SEP 21 1988

Docket: 50-498
License No. NPF-76
EA No. 88-112

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

Gentlemen:

This refers to the inspections conducted on February 11 through March 31 and April 5 through May 2, 1988, at the South Texas Project, Unit 1 (STP-1), NRC Inspection Report Nos. 50-498/88-11 and 50-498/88-24. During these inspections, NRC personnel reviewed two events that were reported to the NRC and involved the apparent failure to satisfy Technical Specification (TS) requirements. Following a review of the events, an enforcement conference was held on May 26, 1988, in the Region IV office in Arlington, Texas.

One event involved the operation of STP-1 in Mode 1 in what appeared to be a condition outside TS Action Statement 3.7.1.6.b which requires that with two less than the required four steam generator atmospheric steam relief valves operable, at least three steam generator atmospheric relief valves should be restored to operable status within 72 hours. (These valves are normally referred to as steam generator power-operated relief valves (PORVs).) Your plant staff entered TS 3.0.3 for operational convenience to complete a self-imposed surveillance requirement to satisfy a safety evaluation for continued operation which addressed the operability status of the four steam generator PORVs that had improper BUNA-N seal material installed in the hydraulic actuators and hydraulic pumps.

Specifically, on April 24, 1988, when steam generator PORVs "A" and "D" were inoperable, the plant operations staff entered TS 3.0.3, isolated steam generator PORV "C" for 8 minutes and cycled the valve by remote manual operation. The plant staff then restored steam generator PORV "C" to automatic operation status and exited TS 3.0.3. Subsequently, the plant operations staff again entered TS 3.0.3 isolated steam generator PORV "B" for 10 minutes and cycled the valve by remote manual operation. The plant staff then restored steam generator PORV "B" to an automatic operation status and exited TS 3.0.3.

The circumstances involved with the testing of the steam generator PORVs did not make the valves functionally inoperable. In the safety analysis, FSAR Chapter 15, operation of the steam generator PORVs is assumed in accident analysis for mitigation of small break LOCA, feedwater line break, loss of normal feedwater and loss of offsite power. These events require only manual operation of the steam generator PORVs to mitigate the conditions in later stages of the events. The TS surveillance requirements for the PORVs requires verification that all valves will open and close fully by operation of manual controls.

RIV:C:PSD
EJHoller;df
9/19/88

EO
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9/16/88

D. DRP
L. J. Allan
9/19/88

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As a collateral matter, the plant operations staff thought that the testing situation would require the declaration of valve inoperability. This may have been because of the wording of the TS Limiting Condition for Operation associated with the steam generator PORVs. You are encouraged to further investigate this and to initiate a TS change, if appropriate.

Although in this instance there was no immediate concern for the safety of the plant, the NRC considers this event significant because of the failure of the plant staff to understand the proper application of TS requirements to the operation of STP-1. The plant operations staff made a conscious decision to enter TS 3.0.3 to test the steam generator PORVs. The STP-1 bases explicitly prohibit the entry into TS 3.0.3 for operational convenience. Although the NRC does not believe that it would have been necessary to shut down the operation of STP-1 in this instance, the NRC does believe that other appropriate regulatory options, such as enforcement discretion or a temporary waiver of compliance, were available and should have been pursued. The NRC does not intend to take further action regarding this matter at this time because of your identification and prompt reporting of this event, your prompt and extensive corrective actions described during the enforcement conference, and your performance in the area of adherence to TS requirements during the early phases of plant operation.

The violation in the enclosed Notice of Violation addresses the other event discussed at the enforcement conference and involves the discovery by Houston Lighting & Power Company on February 9, 1988, that 7 of 12 feedwater flow transmitters were isolated. These feedflow transmitters were part of the Excessive Cooldown Protection System and were required to be in operation by TS 3.3.2 in Modes 1, 2, and 3. The feedflow transmitters had been isolated since April 1987 even though STP-1 had entered Mode 3 on November 22, 1987, and January 30 and February 7, 1988, and the facility had operated in that mode for several days on each occasion. The NRC considers this event potentially significant and is concerned that the programmatic weakness that led to the feedflow transmitters being isolated could adversely affect other safety-related activities.

The violation described in the enclosed Notice has been classified at a Severity Level IV. As indicated in Supplement I of the NRC Enforcement policy, significant violations of this type are normally classified at a Severity Level III. However, after careful consideration of the factors involved, this violation has been classified at a Severity Level IV because, at the time of discovery (before initial criticality - Mode 2), the feedwater system had not been operated at a flow rate sufficient for the flow indication to register in the control room; therefore, the licensed operators could not have detected that the flow transmitters were isolated by direct observation. Further, because the Excessive Cooldown Protection was not required by the STP-1 accident analysis, the TS requirement was deleted on May 24, 1988.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In responding, you may refer to previous correspondence to the NRC where you have documented all or part of your required response to this violation. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,

L. J. Callan, Director
Division of Reactor Projects

Enclosure:
Appendix - Notice of Violation

cc w/enclosure:
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Houston Lighting & Power Company
ATTN: Gerald E. Vaughn, Vice President
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P.O. Box 289
Wadsworth, Texas 77483

Houston Lighting & Power Company
ATTN: S. L. Rosen
P.O. Box 289
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Houston Lighting & Power Company
ATTN: J. T. Westermeier, General Manager
South Texas Project
P.O. Box 289
Wadsworth, Texas 77483

Houston Lighting & Power Company
ATTN: R. W. Chewning, Chairman
Nuclear Safety Review Board
P.O. Box 289
Wadsworth, Texas 77483

Houston Lighting & Power Company

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Central Power & Light Company
ATTN: R. L. Range/R. P. Verret
P.O. Box 2121
Corpus Christi, Texas 78403

City Public Service Board
ATTN: R. J. Costello/M. T. Hardt
P.O. Box 1771
San Antonio, Texas 78296

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

Houston Lighting & Power Company
ATTN: Licensing Representative
Suite 610
Three Metro Center
Bethesda, Maryland 20814

Texas Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:

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