

# The Light company

Houston Lighting & Power

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September 30, 1988

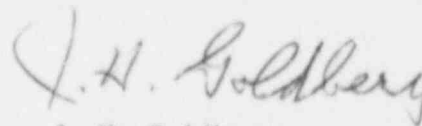
ST-HL-AE-2786  
File No.: G2.4  
10CFR2.201

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

South Texas Project Electric Generating Station  
Unit 2  
Docket No. STN 50-499  
Response to Notice of Violation 8847-02

Houston Lighting & Power Company has reviewed Notice of Violation 499/8847-02 dated August 31, 1988, and submits the attached response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Mr. M. F. Polishak at (512) 972-7071.



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Group Vice President, Nuclear

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499/8847-02

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A Subsidiary of Houston Industries Incorporated

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Revised 08/24/88

Response to Notice of Violation 8847-02

I. Statement of Violation

During an NRC inspection conducted on July 1 through July 31, 1988, the following violation of NRC requirements was identified for failure to maintain nitrogen gas pressure for electrical penetration assemblies:

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.

II. Reason for Violation

The Nuclear Plant Operations Department was responsible for the development of the preventive maintenance checklist (PM) to periodically check nitrogen pressure on Unit 1 electrical penetration assemblies (EPA). Similar PM's had not yet been developed for the Unit 2 electrical penetrations. A mechanism to ensure the issuance of these PM's prior to their maintenance due date had not been developed.

The Reactor Operations group was initially responsible for the performance of maintenance on the EPA's. The Unit 1 Reactor Operations PM's were then superseded by Electrical Maintenance group PM's, however the corresponding action for Unit 2 was not initiated.

III. Corrective Action Taken and Results Achieved

The preventive maintenance checklist for the Unit 2 EPA's has been approved. During performance of the containment Integrated Leak Rate Test (ILRT) which is presently ongoing, nitrogen pressure is not maintained. The nitrogen pressure is restored following completion of the ILRT in accordance with the approved test procedure. Future preventive maintenance will be performed in accordance with the approved PM. It is noted that Engineering is in the process of evaluating the design and qualification requirements of the EPA's to determine the need to maintain continuous nitrogen pressure.

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A review was initiated to identify differences between the Unit 1 and Unit 2 PM indexes. Those PM's omitted from the Unit 2 index have been added. Approximately 140 quality related PM's were identified that had not been developed and exceeded their required maintenance due date (1.25 times the specified maintenance interval). Engineering evaluated the delay and its effect on the equipment and determined that no additional corrective actions are required. The past due PM's will be approved and performed or processed for deferral in accordance with OPGP03-ZM-0002 prior to fuel load.

Personnel making changes to Unit 1 and Unit 2 PM's have been notified that they are responsible for reviewing proposed changes for applicability to corresponding equipment/PM's of the other unit, and for initiating changes as appropriate.

IV. Corrective Steps Taken to Prevent Recurrence

Procedure OPGP03-ZM-0002 has been revised to require that personnel making changes to PM's evaluate the changes for applicability to the other Unit and initiate those changes as applicable. In addition, HL&P will perform an operational readiness review of the Preventive Maintenance program for Unit 2 prior to fuel load.

V. Date of Full Compliance

STP will be in full compliance prior to fuel load.