

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project, Unit 2

Docket: 50-499
Construction Permit: CPPR-129

During an NRC inspection conducted on April 5 through May 2, 1988, three violations of NRC requirements were identified. The violations involved the failure to maintain up-to-date tagging of equipment and to identify the current status of tagged components, the failure to provide covers for the sharp edges on some cable trays to preclude damage to electrical cables, and the failure to maintain an acceptable level of housekeeping in certain areas. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), these violations are listed below:

A. Tagging - Status of Equipment

10 CFR Part 50, Appendix B, Criterion XIV, Inspection, Test, and Operating Status, states, in part, "Measures shall be established to indicate, by the use of markings such as . . . tags . . . the status of inspections and tests . . ." This requirement is amplified by the approved Quality Assurance Program Description (QAPD) of the STP.

Standard Site Procedure (SSP) 13, "Material Control," Revision 3, dated March 30, 1988; SSP 33, "Construction Safety Tagging," Revision 1, dated December 9, 1987; and SSP 8, "Nonconformance Reports," Revision 4, dated April 5, 1988, requires tagging of equipment at different stages of construction to assure that plant system and component status are identified and maintained.

Contrary to the above, on April 20 and 21, 1988, the NRC inspector observed five different types of status tags in the "B" Isolation Valve Cubicles (IVC) in Unit 2 that were invalid or did not correctly identify the status of the tagged components in the main steam and feedwater systems.

This is a Severity Level IV violation. (Supplement II)(50-499/8824-01)

B. Cable Protection - Softeners

10 CFR Part 50, Appendix D, Criterion X, inspection, states, in part, ". . . that activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with documented instructions, procedures, and drawings for accomplishing the activity." This requirement is amplified by the approved QAPD of the STP. SSP 26, Revision 2, requires that "cable and conductors shall be protected from sharp edges, and free from damage."

Contrary to the above, during the week of April 18-22, 1988, the NRC inspector identified more than 25 areas on various cable trays in the "B"

IVC in Unit 2 where the licensee had failed to install cable softeners. Cable softeners were required to cover the sharp edges on cable trays to prevent damage to the electrical cable jacket material where electrical cables had been routed from one cable tray to another cable tray.

This is a Severity Level IV violation. (Supplement II)(50-499/8824-02)

C. Housekeeping

10 CFR Part 50, Appendix B, Criterion II, Quality Assurance Program, requires that, "Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanliness" The licensee is committed to Regulatory Guide 1.39, and ANSI 45.2.3. These documents require that activities be performed under suitable conditions of cleanliness.

Construction Site Procedure (CSP) 12, "General Instruction for Housekeeping During Construction," Revision 6, dated November 19, 1987, paragraph 8.05.03.01 states, "The work area shall be kept sufficiently clean and orderly that construction activity can proceed in an efficient manner that will produce and maintain quality in conformance with specified requirements."

Contrary to the above, during an inspection of Unit 2 Isolation Valve Cubicles (IVC) on April 20 and 21, 1988, the "B" IVC was found to be below the minimum acceptable level for cleanliness and general housekeeping activities. Specifically, excessive amounts of construction debris, abandoned tools, and supplies were scattered throughout the "B" IVC. Excessive quantities of dirt and dust were observed in the cable trays, under the grates, and on the beams and flanges throughout the general area.

This is a Severity Level IV violation. (Supplement II)(50-499/8824-03)

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 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 cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 7th day of June 1988.