NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
South Texas, Unit 1	0 5 0 0 0 4 9 8	1 OF 0 3

TITLE (4)

Deletion of a Door Which Separates Environmental Zones Due to Personnel Error

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR		SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
											0 5 0 0 0
0 9	0 2	8 8	8 8	-	0 5 1	- 0 0	1 0	0 3	8 8		0 5 0 0 0

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
3	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
0 0 0	20.405(a)(1)(ii)	50.36(c)(2)	X 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Charles A. Ayala - Supervising Licensing Engineer	5 1 2 9 7 2 - 8 6 2 8

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	
A											

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single-space typewritten lines) (16)

On September 2, 1988 at 1503 hours, Houston Lighting & Power (HL&P) notified the NRC pursuant to 10CFR50.72 that a door which was required to separate an area classified as a mild environment from an area classified as a harsh environment, was deleted during construction. In the event of a high energy line break of an auxiliary steam line, both areas would have been exposed to harsh environmental conditions. This could have rendered Train C component cooling water and heating ventilating and air conditioning equipment inoperable. The cause of this event was personnel error in the review of a Field Change Request. The auxiliary steam line was immediately isolated until the door could be installed on September 2, 1988. Corrective actions include an engineering review of all floors and walls for openings between harsh and mild environmental zones and revision of architectural drawings to identify doors which form barriers between environmental zones.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF OCCURRENCE:

On September 1, 1988, Houston Lighting & Power (HL&P) Support Engineering Department personnel discovered that a door which had been deleted during construction, was required to separate an area classified as mild environment from an area classified as harsh environment. This condition was determined to be reportable and the NRC was notified pursuant to 10CFR50.72 on September 2, 1988 at 1503 hours.

In June of 1987 a Field Change Request (FCR) was submitted to the Engineering group to remove a door in the Mechanical Auxiliary Building (MAB) due to an interference. The FCR was required, by procedure, to be reviewed for impact on the Safety Analysis Report and on Equipment Qualification. This review was not adequately performed and the FCR was approved in error. The door separated MAB room 67C, which contains high energy auxiliary steam piping, from MAB room 67F which contains Train C essential chillers, component cooling water pump, air handling unit and a supplementary cooler each of which is qualified for a mild environment. In the event of a high energy line break of the auxiliary steam piping, the entire area would be exposed to a harsh environment.

Immediately after discovery of this condition, the auxiliary steam line was isolated upstream of the piping which traverses MAB room 67C to preclude the release of high energy steam into the area.

CAUSE OF OCCURRENCE:

The cause of this event was personnel error on the part of Engineering Department personnel responsible for FCR review. The engineer and reviewer accepted the FCR based only on a review of the architectural drawings which do not provide any indications that certain doors are required to separate environmental zones. In addition, the engineer and reviewer did not properly coordinate the FCR with the Equipment Qualification group nor were they cognizant of the use of certain doors to separate environmental zones. The procedure which controls the review of FCR's requires a review for equipment qualification impact.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

ANALYSIS OF EVENT:

The removal of the door between MAB rooms 67C and 67F resulted in potential for safety-related equipment qualified for a mild environment to be exposed to harsh environmental conditions in the event of a high energy line break. This condition has existed since June of 1987. Although the auxiliary steam line is equipped with redundant safety-related automatic isolation valves which are designed to close to mitigate a high energy line break and minimize the environmental impact, the line itself is non-safety and has been analyzed as a credible event for high energy line break. This credible event could have resulted in a harsh environmental condition in room 67F.

This event is reportable pursuant to 10CFR50.73(a)(2)(vii).

CORRECTIVE ACTION:

The following corrective actions have been taken as a result of this event:

1. A design change was issued to install the door between rooms 67C and 67F. Installation was completed on September 2, 1988.

2. An engineering review is underway of walls and floors which separate harsh and mild environment areas to ensure that large openings are closed or have been taken into account. This review will utilize the equipment qualification design criteria to determine the environmental conditions for areas which contain safety-related equipment. Adjacent areas with different environmental conditions will be identified and openings/doors will be evaluated to assure the project design requirements are met. This action will be completed by October 31, 1988.

3. The architectural door schedules will be revised by October 31, 1988 to identify doors which form barriers between environmental zones.

ADDITIONAL INFORMATION:

There have been no previous LERs regarding missing barriers between harsh and mild environment areas.

The Light company
Houston Lighting & Power

P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

October 03, 1988
ST-HL-AE-2804
File No.: G26
10CFR50.73

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

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-493
Licensee Event Report 88-051 Regarding Deletion Of A Door
Which Separates Environmental Zones Due To Personnel Error

Pursuant to 10CFR50.73, Houston Lighting & Power (HL&P) submits the attached Licensee Event Report (LER 88-051) regarding a personnel error which resulted in deletion of a door which separates environmental zones. This event did not adversely impact the health and safety of the public.

If you should have any questions on this matter, please contact Mr. C.A. Ayala at (512) 972-8628.

G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/BEM/nl

Attachment: LER 88-051

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