

The Light company

Houston Lighting & Power

P.O. Box 1700 Houston, Texas 77001 (713) 228-9311

October 18, 1988

ST-HL-AE-2812
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 Additional NRC Questions Concerning
Notice of Violation 499/8824-01

Reference: (1) HL&P Letter ST-HL-AE-2707 dated July 8, 1988,
J. H. Goldberg to USNRC.

Houston Lighting & Power Company has evaluated the NRC request for additional information concerning the response to Notice of Violation 499/88-24-01. It remains HL&P's position that the Master Completion List is used as a means at STPECS to comply with 10CFR50 Appendix B, Criterion XIV. Temporary tags are provided for informational purposes in the field and to define jurisdictional boundaries. These tags are not used to establish the status of inspections and tests. The following provides clarification of plant procedures used to control information regarding the status of equipment and components.

As stated in the initial response to Notice of Violation 8824-01 (See Reference (1)), the South Texas Project utilizes a computerized Master Completion List (MCL) for tracking open and incomplete items on systems and components before and after Release for Test and Turnover to Operations (Startup Administrative Instruction 8). The MCL is shared by Nuclear Plant Operations Department (NPOD), Nuclear Construction Support Group (NCSG), Startup, and Construction. Responsibility for control of the MCL is transferred with the acceptance of Release For Test and Area Turnover Packages. At the time of system or area turnover to NPOD, the MCL is reconciled to ensure any remaining open items are tracked. In addition, temporary alterations and outstanding clearances are also identified on the MCL at the time of system or subsystem turnover. Temporary alterations and equipment clearance tags are separately controlled in accordance with the respective Startup and NPOD procedures.

Standard Site Procedure (SSP) 19, "QA/QC Responsibilities for System and Area Turnover", requires the contractor's Quality Control supervisor(s) to complete the required inspections and associated documentation review(s) for

LA/NRC/co

Add - QAB

1 LTR
1 ENC

IE01

11

A Subsidiary of Houston Industries Incorporated

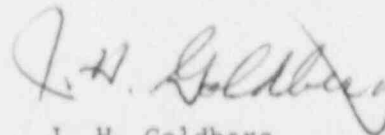
BB10250236 B81018
PDR ADOCK 05000499
G PNU

each Startup system or area in accordance with the turnover schedule. The Material Labor Control System (MLCS) is a computerized statusing system utilized by the construction and quality departments to indicate the status of installation and documentation of each item by commodity, within a startup system or area. SSP-19 identifies responsibility for ensuring that items noted as exceptions in the Area Turnover/System Release for Test Package are contained on the Master Completion List. Open QC inspections and/or actions which have been identified on MLCS and/or the System/Area MCL are monitored until the actual Release for Test date. When final inspection records are not present for a particular item at time of turnover, the item(s) is listed on the MCL.

Use of the MCL is considered to be a suitable means to meet the requirements of 10CFR50 Appendix B, Criterion XIV. Strict accountability is not required for temporary tags utilized as construction/operational aids for informational purposes or identification of jurisdictional boundaries. As summarized in Reference 1, tags utilized at STP that reflect plant and component configurations are properly controlled in accordance with their respective procedures, and/or the status of work activities is tracked on the MCL. Temporary tags which are used for informational purposes or define jurisdictional boundaries are required to be removed prior to system and area turnover to NPOD. The existence of temporary tags prior to turnover to NPOD, in HL&P's opinion, have no significance with regard to the safe operation of the plant. Therefore, the concerns identified by the NRC Inspector should not constitute a violation.

Although not required by procedure, HL&P recognizes that temporary tags placed as construction, test, inspection or engineering aids which no longer accurately represent the status of a system or component should be removed. Their presence could contribute to confusion. As an enhancement to the programs utilized to control the status of equipment and components, startup personnel have been directed to remove these tags upon completion of related testing or work activities.

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



J. H. Goldberg
Group Vice President, Nuclear

KMO/hg

Houston Lighting & Power Company

ST-HL-AE-2812
File No.: G2.4
Page 3

cc:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 1700
Houston, TX 77001

George F. Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Jack E. Bess
Senior Resident Inspector/Operations
c/o U.S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

J. I. Tapia
Senior Resident Inspector/Construction
c/o U.S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

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

R. John Miner (2 copies)
Chief Operating Officer
City of Austin Electric Utility
721 Barton Springs Road
Austin, TX 78704

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

Revised 08/24/88

L4/NRC/co