COMPANY Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

April 21, 1986 ST-HL-AE-1652 File No.: G12.265



Mr. Robert D. Martin Regional Administrator, Region IV U. S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

> Sou l'exas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Third Interim Report Concerning Grease Problem in Safety-Related Equipment

Dear Mr. Martin:

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On September 16, 1985, pursuant to 10CFR50.55(e), Houston Lighting & Power Co. notified your office of an item concerning the mixing of greases in safety-related equipment. Subsequently, on October 11, 1985, this item was expanded to include over-greasing of some safety-related equipment, followed by an Interim Report on December 13, 1985. Attached is the Third Interim Report concerning this item. The final report will be submitted to your office by August 29, 1986.

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

Very truly yours,

J. H. Goldberg Group Vice President,

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Attachment: Third Interim Report Concerning Grease Problems in Safety-Related Equipment

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Houston Lighting & Power Company

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Docketing & Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, DC 20555 (3 Copies)

Advisory Committee on Reactor Safeguards U.S. Nuclear Regulatory Commission 1717 H Street Washington, DC 20555

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South Texas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Third Interim Report Concerning Grease Problems in Safety-Related Equipment

I. Summary

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On September 16, 1985, pursuant to 10CFR50.55(e), Houston Lighting and Power Company (HL&P) notified the NRC - Region IV of a potentially reportable item concerning the mixing of greases in safety-related equipment. This item was subsequently expanded to include the condition of over-greasing and any other grease-related deficiencies. A routine, planned program for the qualification of lubricants (WPP/QCI 2.2-51) was already underway prior to the identification of the grease mixing concern. This program addresses grease mixing and provides for the replacement of lubricant where necessary. The mixing of greases is not considered a significant deficiency, and only the over-greasing condition requires further evaluation pursuant to 10CFR50.55(e).

II. Description of Deficiency

The mixing of greases was identified during the baseline Grease Verification Program. The environmental qualification program which is currently ongoing will identify acceptable lubricants and lubricant mixes. Lubricant replacement will be performed before fuel load, as nacessary. In addition, HL&P has received confirmation from lubricant suppliers that the temporary use of such mixtures prior to extended use under full plant operating conditions will cause no detrimental equipment effects. Therefore, the mixing of greases is not considered a significant deficiency.

Subsequent to the identification of mixed grease, it was determined that the motor bearings of some safety-related equipment may have been over-greased and, if this condition had been left uncorrected it could have resulted in possible equipment damage.

III. Corrective Action

The STP Lubrication Problem Resolution Program has been defined and initiated. A sample inspection and corrective action activity began approximately November 15, 1985 and is scheduled for completion on July 31, 1986. A sample of approximately 45% (69) of the potentially over-greased motors in Units 1 and 2 has been inspected. Of this sample, six (6) axial fan motors were found to have been over-greased. Of these, only one was found with grease on the motor windings which could possibly result in equipment failure. As the inspection continues, any over-greased condition will be corrected.

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A special training plan on "Grease Maintenance" was developed as part of the baseline Grease Verification Program and plant preventative maintenance supervisors and craft personnel were trained.

IV. Recurrence Control

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Procedure CMI-1, Care and Maintenance of Permanent Plant Items, has been revised to require plant preventative maintenance personnel to verify the presence and condition of grease and to initiate a Maintenance Discrepancy (MD) if additional lubrication is determined to be necessary. The disposition of the MD will specify the type of lubricant to be added. This change in procedure will prevent comingling and overgreasing. Appropriate personnel have been reinstructed to the procedural change.

V. Safety Analysis

At this time, the only concern involves grease on the windings of one (1) exhaust fan in the Class LE battery room. Analysis has demonstrated that a postulated failure of this fan assuming a concurrent single failure would not adversely affect the safety of plant operations. However, a final determination of the safety significance of this deficiency cannot be made until completion of the Lubrication Problem Resolution Program. This safety analysis will be provided in the final report.