

APPENDIX A
NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project Units 1 & 2

Dockets: 50-498
50-499

Permits: CPPR-128
CPPR-129

During an NRC inspection conducted March 9 through April 10, 1987, violations of NRC requirements were identified. The violations involved the protection afforded the reactor coolant system during the recovery phase subsequent to hot functional testing and failure to follow procedures for operation of the Residual Heat Removal (RHR) system during hot functional testing. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

A. Failure to Follow Procedures for Maintaining Cleanliness

Criterion V of Appendix B to 10 CFR 50 requires licensee adherence to established procedures. ANSI Standard N45.2.1-1973 establishes the standard for the maintenance of installation cleanliness during the preoperational phase. The licensee is committed to the requirements of this standard via the Quality Assurance Program Description, Section 5.5. The licensee has adopted Standard Site Procedure (SSP) 22 as its vehicle for compliance with ANSI N45.2.1. Section 5.4.2.2 of SSP 22 states, in part: "if activity exposes internal surfaces:

- a) Specific area controls are required.
- b) Special methods are to be utilized for entering the system.
- c) Special methods are required for maintaining system cleanliness during performance of the activities."

Also, Section 5.4.1.2, which applies to the construction phase, states, in part, "Special care shall be taken to prevent the entrance of items that could cause blockage"

Contrary to the above, the NRC inspectors found the above controls were not implemented on April 6-7, 1987. Additionally, the NRC inspectors found no documentation allowing the downgrading of ANSI N45.2.1 cleanliness level B. Furthermore, the NRC inspectors found that the protection of the reactor coolant system as witnessed on the 6th and 7th of April 1987, did not conform to cleanliness requirements set forth in SSP 22, Section 5.4.1.2, which is applicable to the construction phase, in that controls were inadequate to prevent introduction of items which could cause blockage.

This is a Severity Level IV violation. (Supplement II)(498/8708-01)

B. Failure to Follow Procedures for Performing Test

Criterion V of Appendix B to 10 CFR 50, requires that activities affecting quality be prescribed by documented instructions or procedures, and shall be accomplished in accordance with these procedures. The STP Operations Quality Assurance Plan implements this requirement for operation. Final Safety Analysis Report (FSAR) Section 14.2.4.4, states, "The person conducting the test is charged with overall responsibility for performing the test in accordance with the approved test procedure. If, during the performance of the test, it is determined that the test cannot be conducted as written, it is the responsibility of the person conducting the test to suspend testing until the procedure has been modified and approved."

Contrary to the above, on March 11, 1987, while performing the Unit 1 Hot Function Test (HFT) under the subtier Preoperational Test 1-RH-P-04 for the RHR system, the Startup Test Director verbally instructed the operator to perform different steps than those required by the preoperation test, which the operator then performed. Subsequently, the operator was performing an evolution under Procedure 1-RV-RH-236 in support of the Preoperational Test 1-RH-P-04 and skipped two steps in the procedure. The above two actions led to a water hammer event in Trains "B" and "C" of the component cooling water (CCW) system; resulting in structural damage to the Train "B" CCW system.

This is a Severity Level IV violation. (Supplement I)(498/8708-02)

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company (HL&P) 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 violations 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 29th day of May 1987