

JUN 16 1987

In Reply Refer To:
Dockets: 50-498/87-03
50-499/87-03


Houston Lighting & Power Company
ATTN: J. H. Goldberg, Group Vice
President, Nuclear
P. O. Box 1700
Houston, Texas 77001

Gentlemen:

Thank you for your letter of June 5, 1987, in response to our letter and Notice of Violation dated May 15, 1987. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed by
J. E. HALL

 J. E. Gagliardo, Chief
Reactor Projects Branch

cc:
Houston Lighting & Power Company
ATTN: M. Wisenberg, Manager,
Nuclear Licensing
P. O. Box 1700
Houston, Texas 77001

Houston Lighting & Power Company
ATTN: Gerald E. Vaughn, Vice President
Nuclear Operations
P. O. Box 1700
Houston, Texas 77001

Texas Radiation Control Program Director

bcc: (see next page)

RI
TREs:cs
6/16/87

C:RPB/C
Gconstable
6/16/87

C:RPB
JGagliardo
6/16/87

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PDR ADOCK 05000498
Q PDR

IE01

Houston Lighting & Power
Company

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bcc to UMB (IE01)

bcc distrib. by RIV:

RPB

RRI-OPS

RRI-CONST.

RPSB

RIV File

RSTS Operator

R. G. Taylor, RPB/C

Project Inspector, RPB

NRR Project Manager

DRSP

R. D. Martin, RA

Section Chief (RPB/C)

MIS System

D. Weiss, RM/ALF

R. Pirfo, OGC

RSB

R. Hall

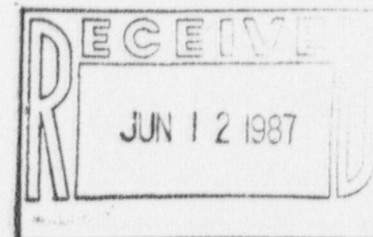
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The Light company

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

June 5, 1987
ST-HL-AE-2173
File No.: G2.4
10CFR2.201

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



South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation 8703-01

Houston Lighting & Power Company has reviewed Notice of Violation 8703-01 dated May 15, 1987 and submits the attached response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Mr. S. M. Head at (512) 972-8392.

A handwritten signature in cursive script, appearing to read "G. E. Vaughn".

G. E. Vaughn
Vice President
Nuclear Plant Operations

SMH/hg

Attachment: Response to Notice of Violation 8703-01

~~8703-01-343~~

L4/NRC/rv/hg-0

IC-87/175

IE01

Houston Lighting & Power Company

ST-HL-AE-2173
File No.: G2.4
Page 2

cc:

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

M.B. Lee/J.E. Malaski
City of Austin
P.O. Box 1088
Austin, TX 78767-8814

N. Prasad Kadambi, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

A. von Rosenberg/M.T. Hardt
City Public Service Board
P.O. Box 1771
San Antonio, TX 78296

Robert L. Perch, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

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

Dan R. Carpenter
Senior Resident Inspector/Operations
c/o U.S. Nuclear Regulatory
Commission
P.O. Box 910
Bay City, TX 77414

Claude E. Johnson
Senior Resident Inspector/Construction
c/o U.S. Nuclear Regulatory
Commission
P.O. Box 910
Bay City, TX 77414

M.D. Schwarz, Jr., Esquire
Baker & Botts
One Shell Plaza
Houston, TX 77002

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

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation 8703-01

I. Statement of Violation

Criterion V of Appendix B to 10CFR50, requires that activities affecting quality be prescribed by documented instructions or procedures, and shall be accomplished in accordance with these procedures. The South Texas Project Operations Quality Assurance Plan implements this requirement.

Plant General Procedure (PGP) OPGP03-ZL-0002, Revision 4, "New Fuel Receipt, Inspection and Storage," Step 8.4, requires that inspection personnel perform a contamination survey of the fuel assemblies to determine if the alpha contamination is within the procedure limit of less than 20 dpm. This reading must also be properly recorded in the inspection data sheets.

Contrary to the above, on February 18, 1987, the NRC inspector noted the alpha contamination readings for two fuel assemblies were inaccurately recorded as less than 50 dpm. This inaccurate recording exceeds the procedure limit and requires that precautionary measures be undertaken. No actions were taken by the licensee based on this recorded data. It was determined later that the actual contamination readings were well below the 20 dpm requirement.

II. Reason for Violation

This violation resulted from failure to follow procedures. However, the procedures involved were written in a manner that increased the possibility of human error in following procedural requirements. Specifically, the procedures which required alpha contamination readings for both the fuel and shipping cask indicated different acceptable levels for each. The acceptable limit for the exterior of the shipping cask was 50 dpm while the corresponding limit for the fuel was 20 dpm. In the case cited in this violation, the technicians involved in monitoring the fuel simply recorded that the levels were less than the higher of the two acceptance limits (i.e. < 50 dpm) rather than below the lower limit of detection. In all cases, the intent was to record the fact that no detectable level of contamination existed on the fuel. No precautionary measures were undertaken by personnel because it was recognized that the recorded contamination level meant that no detectable contamination existed.

III. Corrective Action Taken and Results Achieved

All data sheets for fuel receipt were reviewed and corrected as necessary. Verification in each case was obtained that in fact no detectable level of contamination on the fuel elements existed.

IV. Corrective Steps Taken to Prevent Recurrence

To avoid recurrence of this violation, STP has taken the following actions:

- o Health & Safety technicians involved with fuel receipt attended training to emphasize procedural requirements related to this violation.
- o Procedural revisions have been made to provide the contamination limits on the data sheets.
- o The limits for alpha contamination have been revised so that limits for both fuel and the shipping cask surface are the same.

V. Date of Full Compliance

STP is in full compliance at this time. The first core load has been received on site. No further violations of this type have occurred.