

The Light company

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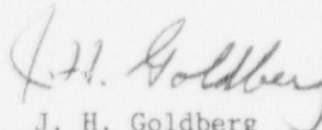
September 28, 1987
ST-HL-AE-2337
File No.: G2.4
10CFR2.201

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 8727-01

Houston Lighting & Power Company has reviewed Notice of Violation 8727-01 dated August 28, 1987, and submits the attached response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Mr. J. S. Phelps at (512) 972-7071.



J. H. Goldberg
Group Vice President, Nuclear

WPE/hg

Attachment: Response to Notice of Violation 8727-01

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Revised 07/16/87

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Response to Notice of Violation 8727-01

I. Statement of Violation

"Criterion V, Appendix B of 10 CFR Part 50 requires that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions. The specification for piping erection and field fabrication, Specification 5A010PS0002, requires that external surfaces of stainless steel shall be free of organic films and contaminants such as oil, paint, and preservatives.

"Contrary to the above, the NRC inspectors observed that the external surfaces of the discharge piping of the containment spray pumps, the high head safety injection pumps, and the low head safety injection pumps were spattered with paint, insulation glue, and lubricants."

II. Reason for Violation

During coating and insulation activities, inadequate protection was provided to surrounding equipment and piping.

III. Corrective Action Taken and Results Achieved

Actions taken to correct the deficiencies are complete. The insulation contractor (PCI, Incorporated) conducted an inspection of insulated equipment and components in areas where the potential existed for adhesive spillage or splattering on stainless steel piping. PCI found no additional cases. The insulation adhesive (Rubatex) is known to be unacceptable for coating stainless steel equipment. Spilled and/or splattered Rubatex which was found on stainless steel piping was removed. PCI also retrained its personnel to ensure that the cleanliness and protection requirements of site specification 5A010PS0002 are maintained during insulation installation.

Ebasco Constructors, Incorporated (ECI) also performed a reinspection program for piping in both units. The reinspection program identified additional instances of foreign material on the exterior of stainless steel pipe. These cases were documented on Nonconformance Reports (NCRs). Apart from the Rubatex, the foreign material found on the piping was determined to have acceptable levels of halogens and would not adversely effect the stainless steel pipe. Therefore, the oil/grease, paint, and tape residue identified on the pipe in the reinspections did not need to be removed. As stated above, PCI removed the Rubatex.

IV. Corrective Steps Taken to Prevent Recurrence

In addition to the retraining of PCI personnel, ECI coatings applicators, foremen, and general foremen were reinstructed on the requirements for protecting adjacent equipment and piping during coatings activities. Site procedures which govern coatings activities were revised to clarify and enhance these requirements.

STP will include an examination of the external cleanliness of stainless steel pipe in the normal housekeeping activities for Unit 2. Discrepancies identified will be remedied in accordance with approved site procedures.

Current site procedures require an inspection of stainless steel pipe which is to be insulated prior to installation of the insulation. In addition to this requirement, uninsulated stainless steel pipe will be inspected to insure adequate external cleanliness prior to fuel load of Unit 2. Discrepancies will be remedied in accordance with approved site procedures.

V. Date of Full Compliance

STP is in full compliance at this time.