

# The Light company

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

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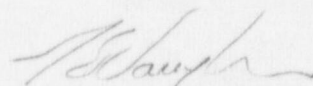
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Response to Notice of Deviation

Reference (1) NRC Inspection Report 87-41 dated September 17, 1987  
(ST-AE-HL-91382).

Pursuant to your request stated in reference 1 please find our response  
to Notice of Deviation 8741-01.

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



G. E. Vaughn  
Vice President,  
Nuclear Plant Operations

ELB/hg

Attachment: Response to Notice of Deviation  
498/8741-01 and 499/8741-01

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PDR ADOCK 05000498  
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cc:

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

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

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/Operations  
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

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

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

Response to Notice of Deviation  
498/8741-01 and 499/8741-01

I. Statement of Deviation

Based on the results of an NRC inspection conducted on June 15 through July 2, 1987, a deviation of your Final Safety Analysis Report (FSAR) was identified. The deviation consisted of failure of the maintenance program to meet the FSAR quality requirements. in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the deviation is listed below:

Section 3.2 of the South Texas Project FSAR, Amendment 61, requires systems important to safety such as fire protection, radwaste, post-accident monitoring, qualified display processing, and similar equipment important to safety systems and components to have quality requirements of 10 CFR 50, Appendix B, or QA requirements of the NRC branch technical positions imposed on the aforementioned systems.

In deviation from the above, the preventive maintenance (PM) program and the maintenance work request (MWR) program failed to meet the FSAR requirements in certain areas. In particular, some components identified on equipment lists as Quality Class 9 within the fire protection system were not treated as quality related in regard to PMs and MWRs. (498/8741-01; 499/8741-01)

II. Reason for Deviation

The quality classification in section 3.2 of the FSAR was misinterpreted in regards to its applicability to PMs and MWRs. While it was understood that the subject systems were quality related, the scope of review by QA was determined by the Engineering assigned Quality Classification and not a blanket coverage of all components within the system.

III. Corrective Steps Taken and Results Achieved

NPOD and Operations QA have reviewed the affected PM's and MWR's which were not identified as quality related when they were performed. This review demonstrated that only 11 MWRs/PMs would have required quality inspection. An inspection of these work packages was made with no discrepancies found. NPOD Maintenance will revise the affected PMs prior to being reissued for performance. Those PMs not yet issued will be revised prior to use.

NPOD Maintenance has issued written directions to ensure PMs and MWRs are not issued for affected components unless they are processed as "quality related." An interim measure was provided to ensure compliance with the MWR/PM procedures and the FSAR. The Preventative Maintenance and the Maintenance Work Request Programs were revised to clarify the determination of proper quality classification.

NPOD Maintenance has provided additional training to Maintenance planners in identifying quality requirements for maintenance activities.

IV. Corrective Steps Taken to Prevent Recurrence

The September 1987 revision of the Preventative Maintenance Program Procedure requires the affected PMs to be revised and reviewed by QC prior to approval for work performance.

V. Date of Full Compliance

STP is presently in full compliance.