The Light company
Houston Lighting & Power

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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 8708-01

Houston Lighting & Power Company has reviewed Notice of Violation 8708-01 dated May 29, 1987 and submits the attached response pursuant to 10CFR 2.201.

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

J. D. Goldberg

J. H. Goldberg
Group Vice President, Nuclear

SMH/hg

Attachments: Response to Notice of Violation 8708-01

L4/NRC/vn/hg-0

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I. Statement of Violation

Criterion V of Appendix B to 10CFR50 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.

II. Reason for Violation

The appropriate level of cleanliness for the Reactor Coolant System was established prior to Cold Hydro and was re-verified prior to Hot Functional Testing in accordance with the applicable Startup Cleaning Procedure. During vessel disassembly after Hot Functional Testing activities were planned to be performed in a manner consistent with maintaining the appropriate level of cleanliness for the system. However, during vessel disassembly it was discovered that temporary full flow filters were damaged and pieces of filter screen were scattered throughout the Reactor Coolant System. At this point a nonconformance report (NRC) was written and the cleanliness of the Reactor Coolant System was declared indeterminate.

At this same time it was determined that the investigative and recovery actions necessary to return the Reactor Coolant System to the required cleanliness condition and the work associated with straightening the Reactor Coolant System thermal wells would require a high traffic of personnel and equipment (i.e. laser hoses, flushing equipment, cameras, borescopes, tube cleaning equipment) in and out of the reactor vessel, loops and steam generators. A Startup management decision was made not to attempt to control entry into the Reactor Coolant System at six different openings, (i.e. reactor vessel, 4 steam generators, pressurizer) but to authorize work by Startup Work Requests and completely re-verify Reactor Coolant System cleanliness after all work was complete. This re-verification process has been completed.

III. Corrective Action Taken and Results Achieved

As noted above, an NCR was initiated following discovery of the missing screen material. Startup Work Requests (SWR) were generated to authorize work on cleaning the reactor coolant system.

To further document and control this situation, an additional NCR was generated to require the reestablishment of the proper level of cleanliness for the primary system, reactor internals, and refueling pool area.

The NCR's indicated above have been closed.

IV. Corrective Steps Taken to Prevent Recurrence

This situation was an isolated occurrence and as such no recurrence control measures were implemented.

V. Date of Full Compliance

STP is in full compliance at this time.