

APPENDIX A
NOTICE OF VIOLATION

Houston Lighting and Power Company
South Texas Project, Unit 1

Dockets: 50-498
Operating License: NPF-76

During an NRC inspection conducted on August 22-26, 1988, a violation of NRC requirements was identified. The violation involved inadequate procedures for abnormal operating conditions. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

Inadequate Abnormal Procedures

Technical Specification 6.8.1 requires, that procedures shall be established, implemented, and maintained covering . . . a. the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Section 5 states, in part, that procedures for abnormal, off-normal, and alarm conditions need to be established.

Station Procedure OPOP01-ZA-0007, "Off-Normal Procedures Writers Guide," was established to implement these requirements. Section 3, Step 3.5 requires that all automatic functions that are caused by the initiating event be listed. Section 4, Step 3.6 requires a list of operator actions necessary to stabilize the event. Section 5, Step 3.7 requires that the actions, which are to be taken after the initiating event, be listed. This listing should contain a list of items to be checked to determine what caused the event, and the steps to recover from the event.

Contrary to the above requirements:

1. Procedure 1; 2POP04-NI-0003 failed to provide sufficient guidance with respect to supplementary actions necessary to assure that all the required channels were placed in a trip condition.
2. Procedure 1; 2POP05-NI-0003, Section 5 failed to have adequate guidance to assure that all Technical Specification required actions were complied with.
3. Procedure 1; 2POP04-RP-0001, Step 4.3.2 failed to list all required actions necessary to comply with Technical Specification 3.4.4 (i.e., removal of power from the power operated relief valve).
4. Procedure 1; 2POP04-RP-0001, Step 5.3 failed to require the operator (the person responsible) to verify that reactor trip bistables tripped, which placed the protective systems in a safe condition.

This is a Severity Level IV violation. (Supplement I.D) (498/8854-02)

8810060359 880928
PDR ADCK 05000498
Q PNU

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company 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 violation 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 28th day of September 1988