

APPENDIX A

NOTICE OF VIOLATION

Houston Lighting & Power Company
South Texas Project, Units 1 and 2

Dockets: 50-498
50-499
Operating Licenses: NPF-76
NPF-80

During an NRC inspection conducted during the period June 7-30, 1989, 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, in part, that procedures shall be established and implemented covering . . . a. the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Sections 5 and 6, require, in part, that procedures for safety-related activities should be established which address abnormal, off-normal, alarm, and emergency/other significant events/conditions.

South Texas Project FSAR, Section 13.5.2, paragraph 3, "Off-Normal Operating Procedures," addresses this requirement by stating that necessary instructions/procedures for restoring an operating variable to its normal operating condition will be provided when the controlled value departs from the normal range or following a perturbation which could degrade if proper action were not taken. A minimum list of plant off-normal operating procedures to be prepared initially was provided in the FSAR. The list included the following items:

- ° Loss of automatic pressurizer control
- ° Malfunction of rod control system
- ° Turbine load rejection

Contrary to the above,

1. Procedure OPOP04-RP-0001, "Loss of Automatic Pressurizer Pressure Control," did not provide adequate guidance regarding the expected failure of a reactor protection pressure channel during low temperature-low pressure operations.
2. Procedures OPOP04-RP-0001, "Loss of Automatic Pressurizer Pressure Control," and OPOP04-RP-0002, "Loss of Automatic Pressurizer Level Control," did not address the failure of a reactor protection channel (pressurizer pressure or level channels, respectively) if the failed channel was not selected for the control function.

3. A written procedure had not been provided addressing the failure of a reactor coolant system temperature protection/control channel.
4. A written procedure had not been provided addressing the malfunction of the automatic reactivity control system.

This is a Severity Level IV violation. (Supplement I)(498/8915-01; 499/8915-01)

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 *10th* day of *August* 1989