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NRC STAFF PROPOSES TO FINE
HOUSTON LIGHTING & POWER COMPANY \$325,000

The Nuclear Regulatory Commission staff has informed Houston Lighting & Power Company (HL&P) that it proposes to fine the company \$325,000 for apparent violations of NRC requirements at the South Texas Project in Matagorda County, Texas.

HL&P has 30 days to respond to the NRC notification. During that time it may pay the civil penalties, or protest any or all of them. If a protest is made and denied, the company may ask for a hearing.

In a notice of violation issued May 28, 1993, NRC officials informed HL&P that the civil penalty was being proposed because of violations involving turbine-driven auxiliary feedwater pumps and emergency diesel generators.

The proposed enforcement actions related to the auxiliary feedwater pumps are:

- The Unit 1 turbine-driven auxiliary feedwater pump was inoperable for a period of 33 days, and the licensee did not take the actions required by the technical specifications to place the reactor in hot standby or hot shutdown.
- The licensee failed to ensure that the causes of overspeed trips were identified and adequate corrective action was taken to prevent repetition.
- Maintenance on the turbine-driven pump governor valve and activities affecting safety-related components were not performed in accordance with appropriate written procedures. One result was that a certain valve was fully closed on January 24, 1993, and remained closed through February 3, 1993. As a consequence, the Unit 2 turbine-driven auxiliary feedwater pump tripped on overspeed due to water buildup in the steam admission

line when the pump was called upon to perform its function on February 3, 1993.

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- The licensee failed to conduct authorized maintenance on the Unit 2 turbine-driven auxiliary feedwater pump overspeed trip linkage in accordance with appropriate written procedures.

The proposed civil penalty is \$175,000.

The proposed enforcement actions related to emergency diesel generators are:

- Emergency Diesel Generator 13 was inoperable for a period of 24 days, from December 29, 1992, until January 22, 1993, and the licensee did not take the actions required to place the reactor into a shutdown condition. License conditions require that three separate and independent standby diesel generators be operable when the plant is in a condition above cold shutdown. (Diesel generators are needed to provide electricity to the plant in case of loss of off-site power.) The inoperable generator would not have run if it had received a start signal due to paint having dripped into the fuel injection ports.
- Procedures did not provide for a post-maintenance test to ensure the operability of Emergency Diesel Generator 13 following the painting of the machine.
- Emergency Diesel Generators 12 and 13 were inoperable for a period of 61 hours from January 12 to 14, 1993, and the licensee did not take required actions to place the reactor in hot standby or cold shutdown. This condition occurred when the number 12 unit was taken out of service for maintenance concurrent with number 13 being inoperable due to the paint problem.

The proposed civil penalty is \$150,000.

For the enforcement action related to the turbine-driven auxiliary feedwater pump, which is identified as a Severity Level III problem, the penalty was increased 50 percent based on the NRC's identification of the inadequacies in HL&P's surveillance test program, 100 percent for the multiple opportunities that HL&P had to identify and correct the cause of the pump overspeed trips, and 100 percent for the duration of the inoperable Unit 1 pump.

For the emergency diesel generators, also a Severity Level III problem, the penalty was increased 100 percent based on the specific notice given with regard to problems caused by painting, and 100 percent for the duration of the inoperable Emergency Diesel Generator 13.

James L. Milhoan, NRC Regional Administrator, told HL&P in his letter concerning this enforcement action that the company should have recognized that the repetitive trips on overspeed of the turbine-driven auxiliary feedwater pumps when they were started in their normal standby mode were indicative of a continuing problem for which the company had not identified the root cause.

Mr. Milhoan's letter said the NRC is also concerned about violations involving unauthorized adjustments during maintenance, because "the maintenance performed by a senior reactor operator was observed by the duty plant manager and general maintenance supervisor, and was not recognized as being an unauthorized activity."

With regard to the emergency diesel generators, Mr. Milhoan noted that paint dripping into the machine was the obvious cause of the failure of unit 13. However, HL&P also failed to take advantage of industry experience and information relative to diesel failures, to conduct a test following painting to ensure that the machine had not been affected, and that "poor communications and poor work control processes also appear to have played a role."

Mr. Milhoan further noted that the staff recognizes that HL&P took "immediate corrective action...when these problems were identified to restore compliance with the license technical specification requirements, and that considerable corrective action has been taken to improve reliability of the turbine-driven auxiliary feedwater pumps and to prevent problems similar to that which resulted in Emergency Diesel Generator 13 being inoperable. However, at the time of the enforcement conference (on April 22, 1993) HL&P had not developed with specificity the broader corrective actions needed to eliminate the contributing causes of these problems..."