

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

April 6, 1990
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File No.: G02.04
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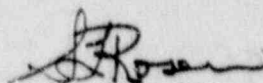
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Notices of Violation
(498/9002-01, 02, 03; 499/9002-01, 02, 03)

Houston Lighting & Power Company (HL&P) has reviewed Notices of Violation (498/9002-01, 02, 03; 499/9002-01, 02, 03) dated March 8, 1990, and submits the attached response pursuant to 10CFR2.201.

In addition to the Notices of Violation, Inspection Report 90-002 included inspector follow-up item 90-02-04 regarding review activities associated with commercial grade procurement. We have evaluated over 4,000 spare and replacement items, estimated to be 70% of those purchased by HL&P as commercial-grade. The results of the evaluation are being reviewed by HL&P. To date, less than 25% of the evaluated items require follow-up activities such as commercial surveys, inspections, tests, and/or further engineering analysis. HL&P expects this program to be complete by January 15, 1991. HL&P wishes to discuss this program in more detail with the NRC and requests a meeting in the Region IV offices for this purpose. We will contact your staff to arrange a time and date for this meeting.

If you should have any questions on this matter, please contact Mr. P. L. Walker at (512) 972-8392 or myself at (512) 972-7138.



S. L. Rosen
Vice President, Nuclear Engineering

PLW/jg

Attachments: 1) Response to Notice of Violation (498/9002-01,; 499/9002-01)
2) Response to Notice of Violation (498/9002-02,; 499/9002-02)
3) Response to Notice of Violation (498/9002-03,; 499/9002-03)

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Revised 12/15/89

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation (498/9002-01; 499/9002-01)

I. Statement of Violation

Criterion III of Appendix B to 10CFR Part 50 requires that measures shall be established to assure that the design basis is translated into the appropriate specifications, procedures, and instructions.

Contrary to the above, the design requirement for seismic retaining clips on Class 1E electrical relays was not incorporated into installation instructions associated with modifications made to provide remote shutdown capability of the emergency diesel generators (EDGs). This resulted in Class 1E electrical relays in each of the six EDG cabinets having seismic retaining clips which were either loose or missing.

II. Houston Lighting & Power Position

HL&P concurs that the cited violation occurred.

III. Reason for Violation

The root cause of failure to install seismic retaining clips on the affected relays was inadequate design change preparation. All of the required material for seismic qualification of the subject relays was not verified as being included in the material list or specified in the implementation instructions.

The root cause of having loose seismic retaining clips on Unit 2 relays is believed to be due to incorrect reinstallation following maintenance and testing activities.

Missing Seismic Retaining Clips:

Three relays were installed on each unit as part of the installation of emergency stop switches for the standby diesel generators. The original Configuration Control Packages (CCPs), one for each unit, for installation of the switches specified "GP"-type relays which are seismically qualified and require use of a seismic retaining clip. Neither of the CCPs listed retaining clips in the list of required material, nor did the installation instructions require installation or verification of installation of the retaining clips.

Prior to installation of the "GP" relays on Unit 2, a third CCP was issued for installation of new "EGP" relays and bases to replace the "GP" relays in Unit 2. The work documents for the emergency stop switch CCP in Unit 2 included the retaining clips and the relays were installed correctly.

A separate CCP and separate work requests were implemented for the emergency stop switch design change to Unit 1. The Unit 1 work documents did not order retaining clips or require their installation. This led to the retaining clips not being installed on the relays for the Unit 1 emergency stop switches.

An additional relay on a Unit 2 standby diesel generator was discovered to be without a retaining clip. However, no documentation has been identified which would establish why this particular relay did not have a seismic retaining clip.

Loose Seismic Retaining Clips:

Six relays (three each for Unit 1 and Unit 2 standby diesel generators) were discovered to have loose retaining clips. The clips were not correctly fitted in a horizontal position. No work document was identified that could be specifically associated with these relays. However, some maintenance and testing activities could involve checking the state of the relays; access to a relay for maintenance or testing purposes would require removal of the seismic retaining clip. These activities could provide an opportunity for improper re-installation of the retaining clips.

IV. Corrective Actions Taken and Results Achieved

The missing retaining clips on the Unit 1 and Unit 2 standby diesel generators have been installed. The loose retaining clips identified on Unit 2 relays have been properly installed.

A sample of configuration change documents involving relay installation will be reviewed to determine if the documents adequately addressed seismic installation requirements. Field installation will be confirmed as being seismically correct. This action will be completed by May 31, 1990.

V. Corrective Action Taken to Prevent Recurrence

The following corrective actions will be taken:

- 1) A training bulletin will be issued to instruct personnel on the correct method for installation of retaining clips on relays of the affected type. The bulletin will be issued by April 27, 1990.
- 2) The design verification checklist will be revised to ensure that seismic qualification is considered in the preparation of design changes. The checklist will be revised by May 24, 1990.

VI. Date of Full Compliance

The missing seismic retaining clips have been installed. The loose seismic retaining clips have been properly installed. STPEGS is in full compliance; however, additional assurance that the full scope of the problem has been adequately identified will be provided by a review of configuration change documents as noted in Section IV. The review is scheduled for completion by May 31, 1990.

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation (498/9002-02; 499/9002-02)

I. Statement of Violation

Criterion VIII of Appendix B to 10CFR Part 50 requires that measures shall be established to identify and control materials, parts, and components, in order to prevent the inadvertent use of incorrect material, parts, and components.

Section 9.0 in Operations Quality Assurance Plan requires that measures be established to identify the status of receipt inspected items in order to show the acceptability or nonacceptability of an item for installation or use.

Contrary to the above, certain fittings which had been procured as safety-related and meeting ASME Code Section III, Class 2, requirements, were commingled with like fittings which had been previously purchased as nonsafety-related. The HL&P part numbers, referred to as class/bins, and the material control codes were the same for both types of fittings, thereby creating a potential for inadvertent usage of nonsafety-related parts in safety-related applications.

II. Houston Lighting & Power Position

HL&P concurs that the cited violation occurred.

III. Reason for Violation

The root causes for this violation were as follows:

- 1) Inadequate guidance was provided concerning proper evaluation and actions to be taken when procurement levels are changed.
- 2) Procedures did not address actions to be taken when consolidating class bins or assigning new class bins.

Parker Hannifin fittings were procured under a purchase order dated July 13, 1988 and classified as Procurement Level III (commercial grade procurement). The intended use of the material, as noted on the material control system, was later changed from "Wide Range Gas Monitors, GA Technologies," to "ASME Section 3 Class 2, Parker Hannifin." Additionally, the safety class for the items was changed from "4" to "2". The exact reason for this could not be established.

Subsequently, when additional fittings were reordered, the purchase requisition included the statements, "Non Safety-Related 10CFR21 Does Not Apply" and "Procurement Level III" based on the initial procurement level classification. However, the purchase requisitions were later modified by substituting the statements, "Nuclear Safety-Related/10CFR21 Applies" and "Procurement Level II" based on the changed material control system description and classification. The new fittings were acquired as safety class and placed in the warehouse with the nonsafety grade material, resulting in commercial-grade and ASME material being located in the same class bin.

IV. Corrective Actions Taken and Results Achieved

The existing stock under the affected part numbers was placed on hold. Items under the affected part numbers have been reviewed to verify the safety classification of their application.

The hold on use of the identified parts was lifted after certification was received from Parker Hannifin that those class bins procured under the original purchase order could be upgraded to ASME Section 3 Class 2 material with 10CFR21 traceability. The procurement level has been changed from "III" to "II". All material has been released and returned to stock.

V. Corrective Action Taken to Prevent Recurrence

The following corrective actions are being taken to prevent recurrence:

- 1) Departmental procedure NPMMP-4.12Q, "Preparation of RPDS for Items and Services," has been revised to include technical considerations involving changes to the materials classification system and to incorporate requirements governing assignment of new class bins and manufacturers part numbers.

- 2) Changes to procurement levels that have occurred during 1989 and where a change involved changing the procurement level to safety class will be identified. A sample of such changes will be reviewed to determine if the change was properly documented and that commingling of unacceptable material did not or could not have occurred. Results will be evaluated and further actions defined by June 29, 1990.
- 3) Purchase orders used to procure Parker Hannifin fittings have been identified and a sampling established to ensure that any changes in procurement levels were properly executed. The sample population review shall be completed by June 29, 1990.

VI. Date of Full Compliance

The specific events of the violation have been addressed, and no further action is required. Review for potential generic aspects of this concern is in progress. Corrective actions to prevent recurrence are expected to be completed by June 29, 1990.

South Texas Project Electric Generating Station
Units 1 and 2
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Response to Notice of Violation (498/9002-03; 499/9002-03)

I. Statement of Violation

Criterion XVI of Appendix B to 10CFR Part 50, as implemented by Interdepartmental Procedure IP-4.1Q, requires that conditions adverse to quality such as deficiencies and nonconformances, be promptly identified and corrected.

Contrary to the above, an identified nonconforming condition was not corrected. Nonconformance Report R87-92 was initiated as a result of received material having been procured incorrectly as nonsafety-related. The disposition included an engineering requirement to test the material in order to verify that it met material specification requirements. The nonconformance report was closed out by stating that the material had been processed in accordance with the disposition, and the material was issued for use. However, inspector review identified that the required verification testing had not been performed.

II. Houston Lighting & Power Position

HL&P concurs that the cited violation occurred.

III. Reason for Violation

The root cause for this violation was less than adequate instructions in procedure IP-4.1Q, "Nonconformance Control," that was used for closure of nonconformance report R87-92. Revision 2 of IP-4.1Q did not include clear instructions for closing nonconformance reports.

IV. Corrective Actions Taken and Results Achieved

1. Verification testing has been performed in accordance with the nonconformance report. Test results indicate that the affected material meets specification requirements.
2. A representative sample of past nonconformance reports will be reviewed to ensure that they were properly closed. The results of this review are expected to be available by May 1, 1990.

V. Corrective Action Taken to Prevent Recurrence

IP-4.1Q has since been revised and now incorporates instructions on disposition, implementation, and closure of nonconformance reports. Compliance with the current provisions of IP-4.1Q will prevent improper closure of nonconformance reports.

VI. Date of Full Compliance

Following completion of the sampling review, expected by May 1, 1990, STPEGS will be in full compliance.