

# The Light company

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

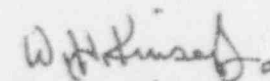
March 04, 1993  
ST-HL-AE-4359  
File No.: G26  
10CFR50.73

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project  
Unit 1  
Docket No. STN 50-498  
Licensee Event Report 93-008  
Technical Specifications Violation Due to a Failure  
to Perform RCB Pressure Surveillances

Pursuant to 10CFR50.73, Houston Lighting & Power (HL&P) submits the attached Unit 1 Licensee Event Report 93-008 regarding a Technical Specifications violation due to a failure to perform Containment Pressure High-1 surveillances. This event did not have an adverse effect on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. J. M. Pinzon at (512) 972-8027 or me at (512) 972-7921.

  
W. H. Kinsey, Jr.  
Vice President,  
Nuclear Generation

KD/ag

Attachment: LER 93-008 (South Texas, Unit 1)

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A Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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C:

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U.S. Nuclear Regulatory Comm.  
Attn: Document Control Desk  
Washington, D.C. 20555

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  
South Texas, Unit 1DOCKET NUMBER (2)  
05000 498PAGE (3)  
1 OF 05TITLE (4)  
Technical Specifications Violation Due to a Failure  
to Perform RCB Pressure Surveillances

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)										
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER									
0	2	0	9	3	9	3	0	0	8	0	0	0	3	0	4	9	3	STP Unit 2	05000 499
									FACILITY NAME	DOCKET NUMBER									
										05000									

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)						
POWER LEVEL (10)	0	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
		20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER
		20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)  
NAME  
Jairo Pinzon - Senior EngineerTELEPHONE NUMBER (Include Area Code)  
(5 1 2) 9 7 2 - 8 0 2 7

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)		X	NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On February 6, 1993, Unit 1 and Unit 2 were in Mode 4 at 0% power. While performing the Unit 1 required shift surveillance, the operator observed that the requirement of Technical Specification 3.3.2 for Containment Pressure High-1 had not been recorded in the log as required. The cause for this violation of Technical Specifications was inaccurate surveillance logs. In the attempt to combine the Unit 1 and Unit 2 procedures into a common procedure, instructions for containment pressure channel check in Mode 4 were inadvertently excluded. Upon identification of the missed surveillance readings, immediate corrective actions included: a field change (FC) was approved to correct the log error, the surveillance (channel check) was performed satisfactorily, and an archival computer report was generated to verify that the containment pressure channels had been within the required tolerances while in Mode 4. HL&P is developing a surveillance procedure enhancement program to ensure that surveillance procedures accurately reflect the design basis and adequately perform the Technical Specification intended functions.

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REQUIRED NUMBER OF DIGITS/CHARACTERS  
FOR EACH BLOCK

BLOCK NUMBER	NUMBER OF DIGITS/CHARACTERS	TITLE
1	UP TO 46	FACILITY NAME
2	8 TOTAL 3 IN ADDITION TO 05000	DOCKET NUMBER
3	VARIES	PAGE NUMBER
4	UP TO 76	TITLE
5	6 TOTAL 2 PER BLOCK	EVENT DATE
6	7 TOTAL 2 FOR YEAR 3 FOR SEQUENTIAL NUMBER 2 FOR REVISION NUMBER	LER NUMBER
7	6 TOTAL 2 PER BLOCK	REPORT DATE
8	UP TO 18 - FACILITY NAME 8 TOTAL - DOCKET NUMBER 3 IN ADDITION TO 05000	OTHER FACILITIES INVOLVED
9	1	OPERATING MODE
10	3	POWER LEVEL
11	1 CHECK BOX THAT APPLIES	REQUIREMENTS OF 10 CFR
12	UP TO 50 FOR NAME 14 FOR TELEPHONE	LICENSEE CONTACT
13	CAUSE VARIES 2 FOR SYSTEM 4 FOR COMPONENT 4 FOR MANUFACTURER NPRDS VARIES	EACH COMPONENT FAILURE
14	1 CHECK BOX THAT APPLIES	SUPPLEMENTAL REPORT EXPECTED
15	6 TOTAL 2 PER BLOCK	EXPECTED SUBMISSION DATE

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
South Texas, Unit 1	05000 498	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	02 OF 05
		9 3	- 0 0 8 -	0 0	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

DESCRIPTION OF EVENT:

On February 6, 1993, at 0432 hours, Unit 1 and Unit 2 were in Mode 4 at 0% power. While performing the Unit 1 required shift surveillance, the operator observed that the shift surveillance requirement of Technical Specification 3.3.2 for Containment Pressure High-1 had not been recorded in the log as required. The surveillance procedure log incorrectly indicated that containment pressure channel check is required only in Modes 1, 2, and 3 per Technical Specifications 3.3.2 and 3.3.3.6. The Technical Specifications require a Containment Pressure High-1 channel check once every twelve hours during plant operation in Modes 1, 2, 3, and 4. Unit 2 was immediately notified that this procedure error would also affect their required shiftly surveillance checks for Containment Pressure High-1.

The surveillance procedure log error was traced back to the attempt to combine the Unit 1 and Unit 2 surveillance procedures which contained these logs in 1991. Instructions for containment pressure channel checks in Mode 4 were inadvertently excluded during the conversion.

CAUSE OF EVENT:

The cause of this event was an undetected error in the control room logs. This error has been traced back to July 29, 1991 when the operator logs for Unit 1 and Unit 2 were superseded by the combined procedures for both units. The combined logs incorrectly excluded the requirement for the containment pressure channel checks in Mode 4.

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LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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South Texas, Unit 1		05000 498		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	03 OF 05
				9 3	- 0 0 8 -	0 0	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

ANALYSIS OF EVENT:

Failure to meet the requirements of the Technical Specifications is reportable pursuant to 10CFR.73 (a)(2)(i). There were no adverse radiological or safety consequences as a result of this event. An Emergency Response Facility Data Acquisition and Display System archival file data report for operation in Mode 4 dating back to July 29, 1991 was retrieved for the computer points associated with each of the required pressure transmitters for both units. This report verifies that the maximum difference between channels did not exceed 2 psig as required by the Technical Specifications channel check requirement.

The purpose of the Containment Pressure ESF actuations is to protect the containment integrity against an over pressurization occurrence and to prevent or minimize the release of radioactive fission products to the environment. Containment Pressure High-1, which is derived from two of three pressure channels exceeding three psig, is utilized to actuate the SI signal that subsequently actuates a number of other ESF/Safeguards functions. The High-1 actuation signal is required to be operable in Modes 1-4 such that protection is afforded against events that could result in the release to the containment (large and small break LOCAs and steamline breaks).

CORRECTIVE ACTIONS:

1. An archival computer report was generated to verify that the containment pressure channels had been within the required tolerances while in Mode 4.
2. The operator log in the procedure was corrected to reflect the Technical Specifications requirement for Containment Pressure High-1 channel checks.
3. The Technical Specification-related operator logs were reviewed for accuracy and completeness. No other Technical Specification discrepancies were found.

LICENSEE EVENT REPORT (LER)  
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South Texas, Unit 1	05000 498	9 3	- 0 0 8 -	0 0	04 OF 05

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

CORRECTIVE ACTIONS: (Con't)

4. HL&P is developing a surveillance procedure enhancement program to ensure that surveillance procedures accurately reflect the design basis and adequately perform the Technical Specification intended functions. The scope, methodology and schedule for this program will be established by March 24, 1993.

ADDITIONAL INFORMATION:

Previous events involving incomplete Technical Specifications required surveillance due to inadequate procedures that were reported to the NRC within the last three years were:

- Unit 1 LER 90-003: "Failure to Perform a Technical Specification Required Surveillance." Attributed to a deficient procedure
- Unit 1 LER 92-004: "Shunt Trip Contacts for Manual Reactor Trip Breakers Not Tested per Technical Specifications." Attributed to inadequate review procedure and unfamiliarity of individual(s) who developed procedure for manual reactor trip feature
- Unit 1 LER 92-011: "Reactor Coolant Pump Undervoltage and Underfrequency Surveillance Not Performed Completely per Technical Specifications." Attributed to inadequate understanding of a Trip Actuating Device Operability Test definition
- Unit 1 LER 92-013: "Containment Spray Channels Not Being Completely Verified as Required per Technical Specifications." Attributed to inadequate procedure review and inability of individual(s) who developed test procedure to recognize the significance of the test circuit

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LICENSEE EVENT REPORT (LER)  
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South Texas, Unit 1	05000 498	9 3	- 0 0 8 -	0 0	05 OF 05

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

ADDITIONAL INFORMATION: (Con't)

- Unit 1 LER 92-017: "Feedwater Isolation Response Time Not Being Correctly Tested as Required per Technical Specifications." Attributed to inadequate surveillance test procedure developed prior to initial operation of Unit 1 and Unit 2
- Unit 1 LER 92-021: "Main Steam Isolation Response Time Testing Not Being Correctly Tested as Required per Technical Specifications." Attributed to failure of individual(s) who developed the surveillance test to recognize the testing requirement
- Unit 1 LER 93-003: "Technical Specification 3.0.3 Required Shutdown of Both Units Due to Inoperable Steam Line Pressure Channels." Attributed to failure of individual(s) who developed the surveillance test to fully understand the calibration of time constants