

The Light company

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

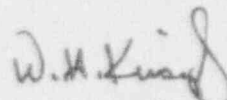
April 2, 1993
ST-HL-AE-4367
File No.: GC2.04
10CFR2.201

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

South Texas Project
Unit 1 and 2
Docket Nos. STN 50-498; STN 50-499
Reply to Notice of Violation 9235-06
Regarding Two Examples of Failure to Meet
Requirements of the Fire Protection Program

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9235-06 dated March 3, 1993, and submits the attached reply.

If you have any questions, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7921.



W. H. Kinsey, Jr.
Vice President
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KPD/pla

Attachment: Reply to Notice of Violation 9235-06

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Project Manager on Behalf of the Participants in the South Texas Project



Houston Lighting & Power Company
South Texas Project Electric Generating Station

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I. Statement of Violation:

Technical Specification 6.8.1.h requires that written procedures shall be established, implemented, and maintained covering the activities of the fire protection program. Two examples of violating this requirement are stated below:

1. Procedure OPGP03-ZF-0004, Revision 1, "Control of Transient Fire Loads," Paragraph 4.1, requires that wood shall not be used in areas containing safety-related equipment or systems unless noncombustible substances are not commercially available. Wood products (scaffolding, platforms, lay down blocks, etc.) shall not be taken into such areas earlier than necessary to support work activities.

Contrary to the above, on December 12, 1992, it was identified that a wooden folding table and wooden scaffolding material were being stored in the safety-related Emergency Diesel Generator 23 room.

2. Station Procedure OPGP03-ZF-0018, Revision 6, "Fire Protection System Operability Requirements," paragraph 4.8 requires, in part, ". . . SEALING DEVICES in fire rated assembly penetrations (fire doors; fire dampers; and cable, piping, and ventilation duct penetration seals) shall be operable whenever equipment protected by the fire rated assemblies is required to be operable by the Technical Specifications."

The South Texas Project Electrical Generating Station Updated Final Safety Analysis Report (UFSAR) 3.1.2.1.3 states, in part, "Evaluation Against Criterion 3 - The plant has been designed in accordance with the recommendations of the National Fire Protection Association."

The National Fire Protection Association National Fire Code, 1975 version, requires, in part, "2-2.5.1 Flush-Mounted. Clearances for flush-mounted doors shall not exceed 3/4 inches at the sill."

Contrary to the above, on December 6, 1992, it was identified that the clearance for flush-mounted Unit 1 Door 23, which protects the auxiliary shutdown panel, was 1 1/4 inches at the sill. This condition has existed since issuance of the operating license.

This is a Severity Level IV violation. (Supplement I)
(498;499/9235-06)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violations occurred.

III. Reason for Violation:

Combustible Material in Standby Diesel Generator (SDG) Room.

The storage of combustible material in the SDG Room is likely attributable to personnel error or misunderstanding of procedural requirements, however, at this time the exact cause cannot be established. Additional information regarding this issue will be available for review upon completion of the investigation for Station Problem Report 921449.

Door Sill Clearances

Fire doors exceeding door to sill clearance specifications can be attributed to inadequate detail in design drawings and a failure to require inspections for that attribute.

IV. Corrective Actions:

Combustible Material in SDG 23 Room

- 1) The combustible materials found in the SDG Room were promptly removed upon identification by the inspector.
- 2) The station has conducted a survey of both Units looking for other unqualified tables. These tables will be removed or replaced with non-combustible tables by July 13, 1993.
- 3) Requirements relating to use and storage of wood (i.e., scaffolding, tables, etc.) in areas containing safety related systems will be reiterated to personnel involved in maintenance and testing activities by May 30, 1993.
- 4) Complete SPR 921449 investigation by April 16, 1993.

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IV. Corrective Actions: (con't)

Door Sill Clearances

- 1) Fire watches have been posted on those doors exceeding clearance specifications.
- 2) A survey of fire doors in both Units, to determine compliance with revised clearance criteria, has been completed.
- 3) Applicable drawings have been updated, by DCN CD-00210, to reflect revised door clearance criteria.
- 4) Change Notice 1836 has been approved incorporating an exception to NFPA for door clearance criteria.
- 5) It is anticipated that out of specification doors accessible during plant operation will be corrected by July 30, 1993. Other doors will be scheduled during the next outage of sufficient duration. The July 30 date is subject to change because American Nuclear Insurers' representative must concur with the rework methodology prior to commencing work.
- 6) Fire protection procedures will be revised to require inspection of fire door frame and sill clearances by June 30, 1993.

V. Date of Full Compliance:

HL&P has been in full compliance with the fire door sill requirements since April 2, 1993, when the fire door survey was completed and fire watches were posted for out of specification doors.

HL&P will be in full compliance with the combustible material requirements by July 13, 1993, when the tables are removed or replaced with non-combustible tables.