

# The Light company

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

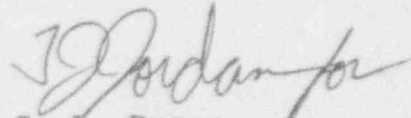
April 2, 1993  
ST-HL-AE-4402  
File No.: G02.04  
10CFR2.201

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 9236-06  
Regarding Failure to Request Relief from ASME Requirements

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9236-06 dated March 5, 1993, and submits the attached reply. HL&P will provide a supplemental report on this Notice of Violation by May 11, 1993.

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

  
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GLM/ag

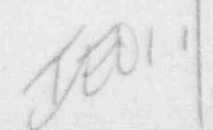
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Project Manager on Behalf of the Participants in the South Texas Project



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South Texas Project Electric Generating Station

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I. Statement of Violation:

Failure to Request Relief from ASME Code Requirements

10 CFR 50.55a requires that ASME Code Class 3 pumps and valves whose function is required for safety undergo IST which complies with the requirements of ASME Section XI to verify operational readiness, unless relief has been granted.

Article IWP-4110 of ASME Section XI, requires that instruments used in IST be of a quality such that instrument accuracy is within 2 percent of full scale.

Contrary to the above, the essential cooling water flow element installation for the Units 1 and 2 component cooling water heat exchanger had an error of 7 percent of full scale and no relief from the provisions of Section XI was granted.

This is a Severity Level IV violation. (Supplement I)  
(498;499/9236-06)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The cause of the event was inadequate management controls to ensure that request for relief from the requirements of ASME Section XI was submitted in a timely manner.

IV. Corrective Actions:

1. An investigation was performed to determine if instrument inaccuracies similar to those discovered in the Essential Cooling Water (EW) System existed in other systems. Similar instrument inaccuracies were discovered in the Essential Chilled Water (CH) and Safety Injection (SI) systems.
2. An evaluation of the data collected during previous ASME Section XI pump testing was conducted and concluded that the EW, CH, and SI instrumentation provided results capable of detecting pump degradation and therefore met the intent of ASME Section XI. System operability for EW, CH, and SI was reviewed and was determined to not be a concern due to sufficient margin existing between the design and the required system flow rates.

IV. Corrective Actions: (con't)

3. For the CH and SI systems, temporary flow measurement devices capable of achieving the required ASME Section XI accuracy will be used until the existing instrumentation is precision calibrated to resolve the inaccuracies. Use of these devices requires revision to the reference value procedures, inservice test procedures, and controlotron calibration specification sheets for the CH and SI systems. These revisions will be completed prior to their next performance.
4. For the EW system, an analysis of the methodology required to meet the ASME Section XI accuracy is continuing. The results of this analysis and the date of compliance with ASME Section XI for the EW system will be provided in a supplemental report scheduled for May 11, 1993.
5. Procedures OPGP03-ZE-0021, "Inservice Testing Program for Valves", and OPGP03-ZE-0022, "Inservice Testing Program for Pumps" will be revised to require that relief requests be submitted to the NRC within six months of discovery of the need for the requests. This revision will also require that compensatory actions be taken, as required, until the relief request is granted by the NRC. These procedures will be revised by September 23, 1993.
6. To prevent recurrence, procedure IP-3.04Q, "Inservice Inspection Program", was revised to require that the responsible engineer ensure that the instrumentation used to collect data for inservice testing is accurate to within the tolerances specified in ASME Section XI prior to inclusion of the instrumentation in the testing plan. In addition, procedure OPGP03-ZE-0031, "Design Change Implementation", was revised to require consideration of programmatic impact to the ASME Section XI Pump and Valve Testing Program in the event of a design change to the existing configuration. Also, the +/- 2% instrument accuracy was specifically identified as a potential impact to Section XI equipment on the Design Change checklist.

V. Date of Full Compliance:

The CH and SI systems will be in compliance with the requirements of ASME Section XI prior to their next performance.

HL&P will provide the date of full compliance in the supplemental report scheduled for May 11, 1993.