

The Light company

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

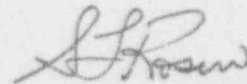
April 1, 1993
ST-HL-AE-4393
File No.: G02.04
10CFR2.201

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Reply to Notice of Violation 9236-05
Regarding Failure to Include Valves in the
Inservice Testing (IST) Program

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9236-05 dated March 5, 1993, and submits the attached reply.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7138.



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Vice President,
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JMP/pla

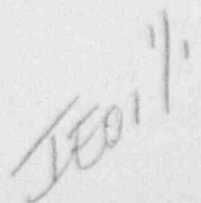
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I. Statement of Violation:

Failure to Include Valves in the Inservice Testing (IST) Program

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 IWV-1100 of ASME Section XI, requires that certain Class 1, 2, and 3 valves required to perform a specific function in shutting down a reactor to cold shutdown conditions or in mitigating the consequences of an accident be tested to assess operational readiness.

Contrary to the above, the licensee did not include the manually operated valve and check valve in each train of the Units 1 and 2 essential cooling water system emergency backwash line in the IST program.

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 this event was an incorrect interpretation of the scope of ASME B&PV Section XI requirements for testing valves. HL&P did not consider the identified valves as meeting the scope of ASME Boiler & Pressure Vessel Section XI Code requirements for testing. HL&P personnel had concluded that the emergency backwash discharge line valves did not perform a function in shutting down the reactor or mitigating the consequences of an accident and thus, were not to be included in the IST program. Since it was believed that these valves did not require testing no thought was given to including these valves in the Inservice Test Plan.

IV. Corrective Actions:

1. HL&P will add the identified valves to the Inservice Test plan during the next revision submittal. The Inservice Test plans for both Units 1 and 2 will be submitted by June 30, 1993.
2. Testing (disassembly and inspection) of the check valves for the emergency backwash discharge line has been incorporated into the Check Valve Inspection procedure. Testing (manual exercising) of the manual valves for the emergency backwash discharge line will be proceduralized to meet the Section XI requirements by April 30, 1993.
3. HL&P will perform a review of Class 1, 2, and 3 systems using the new interpretation to identify valves required to be operated in off-normal and emergency procedures and that are required to shut down the reactor or mitigate the consequences of an accident which need to be included into the IST program. This review will be completed September 30, 1993.

V. Date of Full Compliance:

HL&P will be in full compliance by April 30, 1993, when testing of the emergency backwash discharge line manual valves is incorporated in the appropriate procedure. Testing of the check valves has been incorporated into the appropriate procedure.