

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

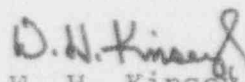
April 2, 1993  
ST-HL-AE-4368  
File No.: G02.04  
10CFR2.201

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

South Texas Project  
Unit 1  
Docket Nos. STN 50-498  
Reply to Notice of Violation 9236-02  
Regarding Inadequate Preventive Maintenance  
on Emergency Diesel Generator #11

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9236-02 dated March 5, 1993, and submits the attached reply. The violation has been addressed as the subject of a Special Report regarding a valid failure of Emergency Diesel Generator #11 (reference letter ST-HL-AE-4300).

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,  
Nuclear Generation

KPD/pa

Attachments: Reply to Notice of Violation 9236-02

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A Subsidiary of Houston Industries Incorporated

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South Texas Project Electric Generating Station

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I. Statement of Violation:

Failure to Provide Adequate Preventive Maintenance Procedure

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained for those activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. RG 1.33, Appendix A, Item 9.a recommends written procedures for the proper preplanning and performance of maintenance that can affect the performance of safety-related equipment.

Contrary to the above, Preventive Maintenance Work Instruction MM-1-DG-92000356, Revision 01.0, "Quarterly Lubrication" did not properly require lubrication of the lever arm on the fuel control shaft which actuates the fuel injection pump rack on Emergency Diesel Generator 11. As a consequence, on December 9, 1992, Emergency Diesel Generator 11 failed its operability test when the lever arm on the fuel control shaft bound and caused abnormal fuel flow to a cylinder.

This is a Severity Level IV violation.  
(Supplement I)(498;499-9236-02)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The cause of this event was that the vendor manual did not require Preventive Maintenance (PM) activities for lubrication of the lever arm. Although other components of the fuel control shaft were lubricated quarterly, the lubrication of the lever arm was not included as a Preventive Maintenance activity. Thus, Preventive Maintenance work instructions did not require lubrication of the lever arm.

IV. Corrective Actions:

- 1) Inspection and lubrication of the remaining Emergency Diesel Generators (EDGs) in both Units has been performed to identify similar freedom of movement problems.
- 2) EDG Preventive Maintenance activities for each EDG have been revised to require lubrication of the lever arm.

IV. Corrective Actions: (Cont'd)

- 3) An evaluation of the EDG design has been performed in order to identify any other component or location which is not currently lubricated but may warrant periodic lubrication. The only location identified as a result of this review was the fuel rack metering rod which passes through each fuel pump. This metering rod was not recommended by the manufacturer, Cooper-Bessemer, for periodic lubrication since during pump operation, some lubrication of the rod does occur. However, it is considered prudent to periodically lubricate and exercise the fuel rack metering rod to assure smooth operation upon engine demand. Preventive Maintenance activities have been revised to periodically lubricate each EDG fuel rack metering rod. Maintenance activities have been performed to lubricate and exercise the fuel rack metering rods in both Unit 1 and Unit 2.

V. Date of Full Compliance:

HL&P is in full compliance at this time.