

# The Light company

Houston Lighting & Power

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

May 11, 1993  
ST-HL-AE-4436  
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  
Supplemental Response to Notice of Violation 9236-06  
Regarding Failure to Request Relief from ASME Requirements

Reference: Correspondence from S. L. Rosen, HL&P, to NRC,  
dated April 2, 1993, "Reply to Notice of Violation  
9236-06, Regarding Failure to Request Relief from  
ASME Requirements" (ST-HL-AE-4402)

Houston Lighting & Power Company (HL&P) provided the initial response to Notice of Violation 9236-06 via the reference noted above. This supplemental response provides the results of the analysis of the methodology required to meet the ASME Section XI accuracy and the date of compliance with ASME Section XI for the Essential Cooling Water (EW) system along with the date of full compliance for this violation.

In the initial response to Notice of Violation 9236-06, HL&P committed to revising procedures and calibration sheets in order to allow the use of temporary flow measurement devices until the existing instrumentation, for the Essential Chilled Water (CH) and Safety Injection (SI) systems, were precision calibrated to resolve the inaccuracies. Contrary to this commitment, the High Head Safety Injection (HHSI) Pump 1A Inservice Test and the Essential Chilled Water Pump 11C Inservice Test were performed on April 5, 1993, and April 15, 1993, respectively, using an unrevised procedure and existing flow instrumentation.

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

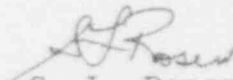
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After HL&P committed to revising the procedures and the controlotron calibration sheet prior to their next performance, the Plant Engineering Department (PED) reviewed the surveillance schedule and assumed that adequate time would be available prior to the next performance of the surveillance to arrange for a vendor to perform the precision calibrations on the existing flow measuring devices. HL&P was unable to procure the services of a vendor prior to April 15, 1993. Changes to the existing procedures were initiated on April 14, 1993, but were not completed prior to the performance of the Essential Chilled Water pump inservice test scheduled for April 15, 1993. The Unit 1 HHSI Pump 1A surveillance, performed on April 5, 1993, had been placed on increased frequency and was not accounted for in the initial review of the surveillance schedule. The actions taken to address this failure to meet a commitment are provided in Section V.

All changes to the initial response for this Notice of Violation are denoted by revision bars.

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

  
S. L. Rosen  
Vice President,  
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GLM/nl

Attachment: Supplemental Response to Notice of Violation 9236-06.

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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, the existing instrumentation will be precision calibrated to resolve the inaccuracies. This precision calibration is tentatively scheduled to begin by the end of May and will be completed prior to May 30, 1993. HL&P will be in compliance with the requirements of ASME Section XI upon completion of the precision calibration.
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. Actions Taken to Address Failure to Meet Commitment:

Upon discovery of the surveillance performance with an unrevised procedure, a Station Problem Report was issued and revision of the applicable procedures and controlotron calibration specification sheet was subsequently completed. A training bulletin will be distributed to the appropriate STP personnel concerning this event, emphasizing the need for increased attention to detail with regards to corrective actions associated with NRC commitments. The personnel involved in this failure to meet an NRC commitment will be counseled on the importance of attention to detail with regards to corrective actions associated with NRC commitments. These actions will be completed by June 1, 1993.

VI. Date of Full Compliance:

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

HL&P will be in full compliance prior to June 30, 1993.