

The Light company

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

May 14, 1993
ST-HL-AE-4447
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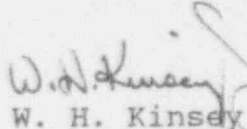
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498; STN 50-499
Reply to Notice of Violation 9304-01
Regarding a Failure to Adhere to
Technical Specifications Because of Inadequate Procedures

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9304-01 dated April 16, 1993, and submits the attached reply.

Information relating to these events was previously provided by submittal of Licensee Event Reports 1-93-006 and 1-93-008, dated February 19, 1993 and March 4, 1993, respectively.

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.
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RAF/sr

Attachment: Reply to Notice of Violation 9304-01

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Project Manager on Behalf of the Participants in the South Texas Project
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I. Statement of Violation:

- A. Technical Specification 3.3.1 requires that inoperable overtemperature/differential temperature channels be placed in the tripped condition within 6 hours when in operational Modes 1 and 2.

Contrary to the above, during the period of January 8-12, 1993, Unit 1 operated in Mode 1 without tripping the inoperable reactor coolant system delta temperature/average temperature loop instrument, RC-430.

- B. Technical Specification Table 4.3-2, "Engineered Safety Features Actuation System Instrumentation Surveillance Requirements," states that the High-1 containment pressure channels have to be channel checked each shift when in operational Modes 1 through 4.

Contrary to the above, during the period February 4-6, 1993, the Unit 1 shift channel check requirement of Table 4.3-2 for containment pressure (High-1) had not been accomplished as required.

These two examples constitute one Severity Level IV violation.
(Supplement I) (498/9304-01)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The reason for this violation is attributed to inattention to detail. In both instances, processes were in place to prevent the occurrence if involved personnel had been diligent in executing their responsibilities.

IV. Corrective Actions:

A. General

Management is continuing its efforts to stress the importance of attention to detail. Recent examples of this effort include:

1. Identification of a Station Human Performance Coordinator with a specific goal of helping line departments improve human performance.
2. Implementation of the Plant Manager's Forum to address issues such as personal performance, including attention to detail and self-verification.
3. Initiatives, such as setting aside one day a week where station meetings are minimized, aimed at getting management and supervision into the field and in contact with station personnel. This allows the opportunity for management to personally reinforce performance expectations and affords station personnel the opportunity to provide feedback directly to their supervisor and/or manager.
4. Site wide group meetings to discuss human performance issues and to solicit suggestions from station personnel on how to improve human performance.

B. Inoperable Overtemperature/Delta Temperature Channels

1. Unit 1, RC-0430 Temperature loop was recalibrated on January 15, 1993, prior to entry into Mode 2. Results were satisfactory.
2. Unit 1, RC-0455 and RC-0456 Pressurizer Pressure loops were recalibrated on January 14, 1993. Results were satisfactory.
3. Affected calibration procedures have been corrected.
4. The human performance errors that caused the procedure error, incorrect calibrations, and subsequent repeat work activities have been reviewed with Maintenance Department Procedure Writers.

IV. Corrective Actions: (Continued)

C. Containment Pressure High-1 Channel Checks

1. An archival computer report was generated to verify that the containment pressure channels had been within the required tolerances while in Mode 4.
2. The operator log in the procedure was corrected to reflect the Technical Specifications requirement for Containment Pressure High-1 channel checks.
3. The Technical Specification-related operator logs were reviewed for accuracy and completeness. No other Technical Specification discrepancies were found.
4. HL&P has developed a surveillance procedure enhancement program to ensure that surveillance procedures accurately reflect the design basis and adequately perform the Technical Specification intended function.

V. Date of Full Compliance:

A. Inoperable Overtemperature/Delta Temperature Channels

HL&P has been in full compliance since April 15, 1993, when the remaining calibration procedures utilizing the incorrect curve were revised.

B. Containment Pressure High-1 Channel Checks

HL&P has been in full compliance since February 6, 1993, when the Operator Log was changed to incorporate the required channel check.