

# The Light company

Houston Lighting & Power

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

May 19, 1993  
ST-HL-AE-4451  
File No.: G02.04  
10CFR2.201

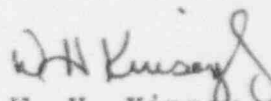
Director, Office of Enforcement  
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498; STN 50-499  
Reply to Notice of Violation and  
Proposed Imposition of Civil Penalty  
Inspection Report 92-17; Enforcement Action 92-175

Houston Lighting & Power Company (HL&P) has reviewed the Notice of Violation and Proposed Imposition of Civil Penalty dated April 19, 1993, and submits the attached replies.

HL&P does not intend to protest the proposed civil penalty. An electronic wire transfer has been made, payable to the Treasurer of the United States, for this civil penalty.

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

  
W. H. Kinsey, Jr.  
Vice President,  
Nuclear Generation

DNB/sr

- Attachments:
1. Affidavit
  2. Reply to Notice of Violation and Proposed Imposition of Civil Penalty, Violation A
  3. Reply to Notice of Violation and Proposed Imposition of Civil Penalty, Violation B

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Project Manager on Behalf of the Participants in the South Texas Project  
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Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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U.S. Nuclear Regulatory Comm.  
Attn: Document Control Desk  
Washington, D.C. 20555

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter )

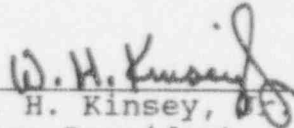
Houston Lighting & Power )  
Company, et al., )

Docket Nos. 50-498  
50-499

South Texas Project )  
Units 1 and 2 )

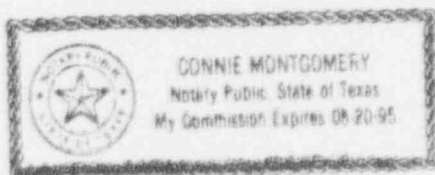
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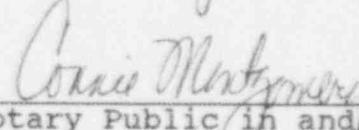
I, W. H. Kinsey, Jr., being duly sworn, hereby depose and say that I am Vice President, Nuclear Generation, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached Reply to Notice of Violation and Proposed Imposition of Civil Penalty (NRC Inspection Report 92-17, Enforcement Action 92-175); that I am familiar with the content thereof; and that the matters set forth therein are true and correct to the best of my knowledge and belief.

  
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W. H. Kinsey, Jr.  
Vice President,  
Nuclear Generation

STATE OF TEXAS )  
 )  
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Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 19 day of May, 1993.



  
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Notary Public in and for the  
State of Texas

I. Statement of Violation A:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

STP Interdepartmental Procedure IP-1.45Q, "Station Problem Reporting," Step 6.1.1, states, in part, that any person who discovers a condition that may impact the safe and reliable operation of the plant shall originate a Station Problem Report (SPR) and if the condition appears to require immediate response, the originator shall report (i.e., call) the condition immediately to the Shift Supervisor followed by documenting the condition on a SPR.

Contrary to the above, on May 19, 1992, after declaring the reactor trip system inoperable for STP Units 1 and 2 and placing both units in Technical Specification 3.0.3 based on this condition, thus requiring immediate response, licensee personnel did not report the condition immediately to the Shift Supervisor. The condition was not reported to the Shift Supervisors until approximately two and one-half hours after the plant manager declared the plant to be in Technical Specification 3.0.3. In addition, the condition was not promptly documented in a Station Problem Report.

II. Houston Lighting & Power Position, Violation A:

HL&P concurs that the cited violation occurred.

III. Reason for Violation A:

The cause for the delay in notifying the operators was that management directed the SPR to be taken to the Operations Manager prior to being taken to the Control Room. As discussed in previous correspondence and meetings with the NRC, this action was influenced by management's concerns regarding how the operators would apply Technical Specification 3.0.3 and management's intent to apprise the operators that a waiver of compliance was being pursued. Also, as previously discussed, these actions and a lack of early involvement by Operations in evaluating the surveillance issue were indicative of more general programmatic issues which are addressed by the corrective actions below. The corrective actions described below also provide increased assurance that SPRs are written promptly.

#### IV. Corrective Actions, Violation A:

The following are the principle actions taken to assure that the Shift Supervisor is promptly notified of conditions that may require immediate response and that problems are promptly documented on an SPR:

1. The SPR procedure was revised to lower the threshold for initiating an SPR, and improve the timeliness of problem identification to the control rooms.
2. Technical Specification Interpretations have been developed to clarify Technical Specification 3.0.3 and provide more detail on the applicability of Technical Specification 4.0.3.
3. The Nuclear Group Policy on reporting safety-related concerns has been revised to emphasize promptly notifying the Shift Supervisor of concerns affecting the operability of systems, structures, and components. The policy also has been revised to emphasize the role of the Shift Supervisors in that Shift Supervisors have ultimate responsibility for determining operability of plant systems, structures, and components.
4. A Plant Operations Policy was written to clarify the plant's policy with regard to Technical Specification 3.0.3 entries, and Technical Specification 3.0.3 shutdowns.

Additional corrective actions were taken to address the contributory causes of this event. The following additional actions were taken to assist in precluding a similar event:

1. A procedure was issued to formalize the process for obtaining Temporary Waivers of Compliance from the NRC.
2. Briefings were given to operators to convey the "lessons learned" from this event.
3. An evaluation was performed by Nuclear Assurance of the support provided to Operations by Engineering. Operations and Engineering management reviewed the findings of the evaluation and jointly developed actions that would improve communications between the two organizations and enhance plant support for plant operability and safety questions.

IV. Corrective Actions, Violation A: (Cont'd)

4. An Organizational Interface Assessment, which has been discussed in previous HL&P letters to the NRC, has been performed by an outside consultant. The purpose of this assessment was to assess organizational interfaces, including communication and work processes, and identify methods to enhance teamwork and organizational performance. As stated in HL&P's letter, ST-HL-AE-4426, from W. T. Cottle to the NRC, dated April 30, 1993, the assessment has been completed and the action plan to implement assessment results will be completed by July 30, 1993.

V. Date of Full Compliance, Violation A:

HL&P is in full compliance.

I. Statement of Violation B:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

STP Procedure OPGP03-ZO-0018, Revision 4, "Technical Specification Interpretation Control," Step 1.2, requires, in part, that this procedure be used for those situations which are not clearly or specifically addressed by wording in the Technical Specifications.

STP Procedure OPGP03-ZO-0040, Revision 0, "Maintenance of the Operations Policies and Practices Manual," Step 3.2.2, states, in part, that memoranda from whatever source that are potentially "Tech Spec Interpretations" should be formally routed by the initiating authority through the formal evaluation process in accordance with OPGP03-ZO-0018, "Technical Specification Interpretation Control".

Contrary to the above, on June 8, 1992, and again on September 3, 1992, Office Memoranda from the Operations Manager to the Policies and Practices Manual were issued which provided clarification of a situation which was not clearly addressed by the wording of Technical Specification 3.0.3 and other Technical Specifications. These memoranda were not formally routed through the formal evaluation process in accordance with OPGP03-ZO-0018.

II. Houston Lighting & Power Position, Violation B:

HL&P concurs that the cited violation occurred.

III. Reason for Violation B:

When the Operations Manager (OM) issued memoranda on June 8 and September 3, 1992, to provide guidance to the control room on Technical Specification required shutdowns and declaration of Unusual Events, he did not recognize that there was a procedure restriction concerning the use of memoranda for potential Technical Specification Interpretations (TSIs).



IV. Corrective Actions, Violation B:

1. A TSI was issued and the procedure for declaring an Unusual Event was revised to document formally the guidance in the September 3, 1992, memorandum. The Operations Policy manual was reviewed and no additional TSIs were found to be necessary to address the guidance in the manual.
2. The OM met with the Shift Supervisors to clarify the guidance provided in the September 3, 1992 memorandum.
3. The Shift Supervisors have been actively participating in meetings on operability issues.
4. The current OM understands the procedure restriction concerning the use of memoranda for potential Technical Specification Interpretations.

V. Date of Full Compliance, Violation B:

HL&P is in full compliance.