

The Light company

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April 13, 1981

ST-HL-AE-652
SFN: C-0570

Mr. G. L. Madsen, Chief
Reactor Projects Branch
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
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SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
RESPONSE TO NRC INSPECTION FINDINGS
DOCKET NOS. 50-498/81-01 AND 50-499/81-01

Dear Mr. Madsen:

The following is our response to the Notice of Violation related to Inspection Report Nos. 50-498/81-01 and 50-499/81-01, dated March 20, 1981.

Some confusion currently exists related to the terms "storage," "maintenance," and "in-place protection" as used in the South Texas Project (STP) General Construction Procedure (GCP)-35 and as described in ANSI N45.2.2. Prior to addressing each finding it is important that the South Texas Project position be clarified.

It is the policy of the South Texas Project to strictly adhere to ANSI N45.2.2 as it applies to the pertinent project activities. ANSI N45.2.2 applies per applicable sections to packaging, shipping, receiving, storage and handling of material. The standard does not apply in its entirety to in-place protection. ANSI N45.2.2 identifies a clear distinction between its scope related to packaging, shipping, receiving, storage and handling, and the case in which items are placed in their final locations within the power plant, referred to by the South Texas Project as in-place protection.

Examples are:

- A. Storage is defined in the standard as, "the act of holding items at the construction site or in an area other than its permanent location in the plant."

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- b. Storage facilities are defined as, "Warehouse or yard areas designated and prepared for holding of items."
- C. Under subpart 6.1.1 (scope) the standard states, "Levels and methods of storage necessary are defined to minimize the possibility of damage or lowering of quality due to corrosion, contamination, deterioration or physical damage from the time an item is stored upon receipt, until the item is removed from storage and placed in its final location."
- D. Under subpart 6.5, removal of items from storage, the standard states, "Items released from storage and placed in their final locations within the power plant, shall be inspected and cared for in accordance with the requirements of Section 6 of this standard and other applicable standards." Paragraphs 6.4.1 (Inspection and Examination) and 6.4.2 (Care of Items) therefore are the only applicable paragraphs of Section 6 that apply to in-place protection of items. The storage area criteria of Section 6 do not apply for items in place.

Our current program incorporates these requirements by proceduralizing the inspection and care of items by Permanent Plant Maintenance in procedure GCP-35. This program requires that in-place protection measures, appropriate to the classification of the item, be taken to prevent degradation. Additional measures to provide environmental protection in the plant areas are taken consistent with the applicable Housekeeping zone designations described in ANSI N45.2.3 and STP procedure GCP-4.

An example couched in practicality would be a pump/motor in its final location in the plant. The project interpretation is that while the surrounding area may not meet the required site storage area requirements, the in-place protection (inspection and care) which consists of QC and Construction inspections and maintenance (care) meets the intended requirements. Through the Permanent Plant Maintenance (PPM) program the pump/motor might, as an example, have a temporary enclosure to exclude contaminants from the surrounding construction process (i.e. sandblast debris), and the motor heater be energized to exclude dampness if called for in its previous storage requirements. Additionally, through the PPM procedure, preventative maintenance personnel will perform maintenance as originally required in storage (i.e. rotate shafts, check oil levels, etc.). The condition of the pump/motor will be continually inspected by QC and Construction. In this fashion both the care and inspection of items will be adhered to as described in ANSI N45.2.2.

Another example of ANSI applicability would be later when piping, instrumentation and power cables are connected to the pumps. It is obvious that the temporary protective cover cannot remain while piping, wiring, and instrument

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lines are being connected. In this case, the maintenance and inspections will continue and the environment will be controlled by procedure in accordance with ANSI N45.2.3.

The conclusion is that:

- A. This interpretation is in accordance with the requirements of ANSI N45.2.2, ANSI N45.2.3, ANSI N45.2.8 or Regulatory Guide 1.38.
- B. The project will continue to comply with applicable subparts of both ANSI N45.2.2 and ANSI N45.2.3.

Responses to the specific findings are as follows:

Finding No. 1 - NSSS equipment was not protected as required by "D" storage requirements

POSITION

The conditions cited are valid in that the equipment did not meet either the Equipment Storage and Maintenance Instruction Record requirements or Sections 6.4.1 and 6.4.2 of ANSI N45.2.2. We would like to point out, however, that the STP position on ANSI N45.2.2 is that Level "D" storage requirements do not apply to in-place equipment.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN

All equipment listed in the NRC report was sealed to preclude airborne contamination. Other equipment and areas not listed were inspected for similar conditions. On October 29, 1980, an HL&P Implementation Review was concluded on storage and maintenance. That review resulted in the issuance of three Corrective Action Reports having to do with maintenance of documentation, organization description of the storage and maintenance department, and access control. As of March 19, 1981, all three were resolved and closed out. On March 10, 1981, B&R Quality Engineering responded to an HL&P QA request to review the status of NRC reports issued since 1978 dealing with storage and maintenance. All previously-identified NRC findings were found to be completed with no lapses of nonconformances. In addition, the letter describes the QC 100% surveillance of maintenance of safety-related items. On March 12, the revised Westinghouse NSSS Storage Manual was issued. By the letter of March 12, 1981, from HL&P Construction to B&R Construction, HL&P has tightened the access control through HL&P approval of the access list. On March 19, 1981, HL&P Construction required the B&R Permanent Plant Maintenance Department to establish a regular schedule of maintenance for NSSS components.

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CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

On February 25, 1981, the first of the weekly housekeeping walk-through inspections was performed and documented. The walk-through inspections are performed by the Area Managers and B&R QC. Since the walk-throughs began, the housekeeping has materially improved. A proposed revision of GCP-35 will clarify the distinction between warehouse storage and in-place protection and also the relationship and attendant requirements of storage versus in-place protection. The proposed revision also clearly makes the Area Managers responsible for in-place protection. On January 26, 1981, HL&P Construction required B&R by memo to:

1. Increase control of access,
2. Defer sandblast activities until maintenance and housekeeping requirements are reestablished,
3. Have housekeeping maintenance requests monitored by area engineers, and
4. Use the most stringent requirements where doubt exists.

On February 12, 1981, HL&P QA issued a letter to B&R Construction and QA Management identifying both NRC and HL&P recent findings relative to both the condition and control of in-place equipment as well as housekeeping. This letter required a B&R Management Action Plan addressing:

1. Physical condition of equipment,
2. Problems not identified or resolved by B&R,
3. Untimely resolution of in-place storage and maintenance discrepancies,
4. Access control,
5. ESMI card deficiencies, and
6. Inadequate instructions.

The response has been provided and is currently under review. On March 9, 1981, B&R Quality Engineering commenced weekly checks of storage and maintenance activities.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All above-mentioned items have been completed except for evaluation of the B&R Management Action Plan and the issuance of the proposed revision of GCP-35. This activity will be completed by May 11, 1981.

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Finding No. 2 - Failure to identify that the RHR pumps were contaminated and to issue a Nonconformance Report

POSITION

The Equipment Storage and Maintenance Instruction (ESMI) cards for this equipment did not contain sufficient information; thus, the QC Inspector (inspecting to the card requirements) had no reason to generate an NCR, resulting in the cited situation.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN

These steps are the same as in Finding No. 1. In addition, the ESMI cards have been revised to delineate the proper in-place protection requirements and the pumps have been recleaned, corrosion inhibitor has been reinstalled, and griffolyn resealed.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

These steps are the same as in Finding No. 1.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All actions will be complete by May 11, 1981.

Finding no. 3 - ESMI cards for NSSS equipment did not adequately address vendor and N45.2.2 requirements for in-place storage

POSITION

The citation is valid in that the cards did not contain adequate requirements, but the requirements are those applicable to care and inspection, not storage.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN

These steps are the same as in Finding No. 1. In addition, the ESMI cards have been changed to include adequate in-place protection requirements.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

These steps are the same as in Finding No. 1.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All actions will be complete by May 11, 1981.

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Finding No. 4 - Failure to provide adequate protection for equipment in the MEAB Unit I and to provide timely disposition for a Nonconformance Report

POSITION

The finding is considered valid.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN

The corrective action is essentially the same as for Finding No. 1; however, some clarifications are required. ESMI Verification Report no. 132, dated November 29, 1979, was answered by correspondence BC-23237, which stated that the pumps and motors had been cleaned, a tarpaulin placed over the plastic drapes, and the roof of the Kelly Closure sealed. This action was verified by QC, and at this time the pump and motors were considered to be in satisfactory condition. For this reason, no NCR was generated in relation to 79-22. Subsequently, more sandblasting was initiated, and on September 9, 1980, NCR No. SG-2691 was generated as a result of the last sandblasting operation. The nine-month lag between 79-22 and SG-2691 was because the situation identified by 79-22 was corrected by actions referenced in correspondence BC-23237 dated November 29, 1979, and SG-2691 was written against a later occurrence. The pumps were rotated three times after SG-2691 was initiated. These dates are September 12, 1980; October 6, 1980; and November 13, 1980. Subsequently, these pumps have been cleaned, inspected, lubricated, and rotated. The motors have been removed to the warehouse, where they will be cleaned and inspected.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

These steps are the same as in Finding No. 1. In addition, a management decision has been made to re-evaluate maintenance performed on nonconforming equipment for the purpose of eliminating maintenance steps which could further damage an item prior to correction of the nonconformance.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The motors referenced will be cleaned and inspected no later than September 1, 1981. All other actions will be completed by May 11, 1981.

If you have any questions regarding these commitments, please contact me.

Very truly yours,



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Executive Vice President

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