

The Light company

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

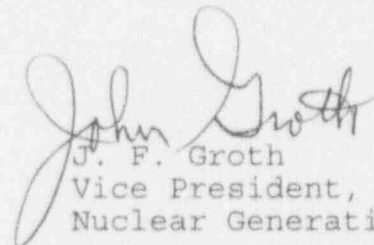
July 18, 1994
ST-HL-AE-4836
File No.: G02.04
10CFR2.201

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

South Texas Project
Unit 2
Docket No. STN 50-499
Reply to Notice of Violation 9416-01
Regarding Failure to Write a Station Problem Report

Houston Lighting & Power has reviewed Notice of Violation 9416-01 dated June 17, 1994, regarding a failure to write a Station Problem Report when a loose hold down stud nut was identified, and submits the attached reply.

If there are any questions regarding this matter, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8664.


J. F. Groth
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Nuclear Generation

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Attachment: Reply to Notice of Violation 9416-01

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IR-94\94-194.001 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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Reply to Notice of Violation 9416-01

I. Statement of Violation:

Criterion XVI, Appendix B of 10 CFR 50, requires that in the case of significant conditions adverse to quality, measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

South Texas Project Station Procedure OPGP03-ZX-0002, "Corrective Action Program," Revision 4, requires that, "any person associated with STP who identifies a deficiency or significant deficiency is responsible for initiating a Station Problem Report in accordance with the requirements of this procedure."

Contrary to the above, the licensee did not write a station problem report when a loose hold down stud nut (a significant potential precursor to stud failure) was identified on April 14, 1994, on the 6L fuel injection pump of Standby Diesel Generator Number 22.

This is a Severity Level IV violation (499/9416-01).

II. Houston Lighting & Power's Position:

Houston Lighting & Power concurs that the violation occurred.

It should be noted that the failure to write a Station Problem Report occurred around March 28, 1994, when a loose hold down stud was found on the 2L fuel injection pump on Standby Diesel Generator 22, rather than on April 14, 1994 with cylinder 6L as stated in the violation.

III. Reason for Violation:

A loose stud/nut was discovered on the 2L fuel injection pump during maintenance on Standby Diesel Generator 22. The Maintenance Crew Supervisor was notified, who instructed the crew to document the deficiency in the work package. In addition, the Crew Supervisor intended to initiate a Station Problem Report to document the deficiency. However, the Crew Supervisor failed to initiate the Station Problem Report. When a similar problem occurred with the fuel injection pump on cylinder 6L on April 14, 1994, both deficiencies were documented on a single Station Problem Report.

The cause of this deficiency was human performance error. A Station Problem Report was not initiated to document the loose hold down stud/nut on fuel injection pump 2L around March 28, 1994.

IV. Corrective Actions:

The bolts on fuel injection pump 2L were replaced and properly torqued.

The following actions have been taken or will be taken to prevent recurrence:

1. The importance of immediate Station Problem Report generation has been discussed with the crew supervisor involved in this event.
2. The importance of immediate Station Problem Report generation after discovery of a deficiency has been reinforced with the Maintenance managers and all but five supervisors. This action will be completed by August 1, 1994.
3. This event will be included in the material for the next Human Performance Day scheduled in the fall of 1994.
4. The hollow studs have been replaced with the new solid studs on the Unit 2 Standby Diesel Generators and on two of the three in Unit 1. Installation of the solid studs in the remaining Unit 1 Standby Diesel Generator will be completed during the train outage scheduled for the week of July 25, 1994.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.