

The Light company

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

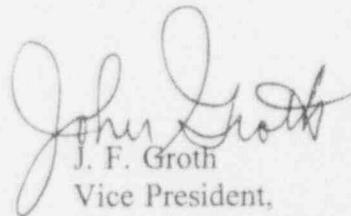
August 17, 1994
ST-HL-AE-4861
File No.: G26
10CFR50.73

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

South Texas Project
Unit 1
Docket No. STN 50-498
Licensee Event Report 94-010
Failure to Perform a Technical Specification Required Surveillance
due to Inappropriate Use of the Equipment Clearance Order Process

Pursuant to 10CFR50.73, Houston Lighting & Power submits the attached Unit 1 Licensee Event Report 94-010 regarding a failure to perform a Technical Specification required surveillance due to inappropriate use of the Equipment Clearance Order Process. Although this event did not have an adverse effect on the health and safety of the public, it does not meet our standards for expected operational performance.

If you should have any questions on this matter, please contact Mr. J. M. Pinzon at (512) 972-8027 or me at (512) 972-8664.


J. F. Groth
Vice President,
Nuclear Generation

JMP/esh

Attachment: LER 94-010 (South Texas, Unit 1)

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A Subsidiary of Houston Industries Incorporated


08/17/94 12:31am

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) South Texas Unit 1 DOCKET NUMBER (2) 05000 498 PAGE (3) 1 OF 4

TITLE (4) Failure to Perform a Technical Specification Required Surveillance due to Inappropriate Use of the Equipment Clearance Order Process

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
07	19	94	94	-- 010 --	00	08	17	94	SOUTH TEXAS, UNIT 2	05000 499
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	100	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)
NAME Jairo Pinzon - Staff Engineer TELEPHONE NUMBER (Include Area Code) (512) 972-8027

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		
YES(If yes, complete EXPECTED SUBMISSION DATE).	X	NO		MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On July 19, 1994, at approximately 1630 hours, Unit 1 was in Mode 1 at 100% power. South Texas Project concluded that Unit 1 had failed to fully meet the surveillance requirements of Technical Specification 4.7.4, Essential Cooling Water System. It was determined that a formal surveillance requirement was not being performed on one essential cooling water system valve for each train, that was locked throttled per an Equipment Clearance Order. It was determined that the intent of the surveillance requirement is that "locked, sealed, or otherwise secured in position" is to ensure a component is physically restrained from movement. An Equipment Clearance Order tag was being used to fulfill the requirement thus the valve was not fully restrained from movement. Immediate corrective actions included reviewing the current list of Technical Specification locked valves maintained in position by an Equipment Clearance Order, revising the Essential Cooling Water surveillance procedure to add throttle valves, which verifies the correct position per surveillance time interval. In addition, locking devices have been designed and installed on these valves.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
South Texas, Unit 1	05000 498	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		94	-- 010 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

DESCRIPTION OF EVENT:

On July 19, 1994, at approximately 1630 hours, Unit 1 was in Mode 1 at 100% power. South Texas Project concluded that Unit 1 had failed to fully meet the surveillance requirements of Technical Specification 4.7.4, Essential Cooling Water System. It was determined that a formal surveillance requirement was not being performed on one essential cooling water system valve for each train, that was locked throttled using an Equipment Clearance Order process. The Nuclear Regulatory Commission was notified of the failure to perform the Technical Specification required surveillance test on July 20, 1994, at 1234 hours.

Unit 1 had entered a Train "A" equipment planned maintenance outage on June 21, 1994, at 0400 hours. Work was planned on the Component Cooling Water supplemental cooler which required that Essential Cooling Water throttle valve, EW-0031, be tagged closed. The Equipment Clearance Order tag used to maintain the valve locked throttled was released and the valve was tagged closed. On June 21, 1994, maintenance on the Component Cooling Water supplemental cooler was completed and the Equipment Clearance Order was released, the Essential Cooling Water throttle valve EW-0031 was returned to a throttled position. On June 23, 1994, the Essential Cooling Water surveillance was performed which verified that Essential Cooling Water throttle valve EW-0031 was in its correct position. The Essential Cooling Water System was returned to service and the Limiting Condition for Operation was exited on June 23, 1994, at 1506 hours.

On June 28, 1994, it was discovered that the Equipment Clearance Order tag used to "lock" the valve had not been hung. The valve was verified to be in its correct position and an Equipment Clearance Order tag hung. The event was reviewed for reportability and determined not to be reportable.

Technical Specification surveillance requirement 4.7.4. reads, in part, as follows:

"At least three essential cooling water loops shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) servicing safety-related equipment that is not locked, sealed, or otherwise secured in position is in its correct position;"

The valve had been verified to be in its correct position on June 23, 1994. Thus, the surveillance was not required to be performed until July 24, 1994. The valve position was verified on June 28, 1994, and the Equipment Clearance Order tag was hung, therefore the surveillance was satisfied. Essential Cooling Water throttle valve EW-0031 was not listed on the monthly position verification surveillance due to it being "Locked Throttled" via an Equipment Clearance Order tag.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
South Texas, Unit 1	05000 498	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 4
		94	-- 010 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

DESCRIPTION OF EVENT: (Continued)

On July 19, 1994, at approximately 1630 hours, after further review of this event, South Texas Project concluded that Unit 1 had failed to fully meet the surveillance requirements of Technical Specification 4.7.4, Essential Cooling Water System. Based on a review of the Equipment Clearance Order, it was determined that the valves were tagged (administrative locked) on March 13, 1994. Subsequently, on March 19, 1994, Unit 1 entered Mode 4. Due to the interpretation that Equipment Clearance Order tag could be used to consider the valves administratively "locked", the 31 day position verification was not performed on these valves as required by Technical Specification 4.7.4. Discussions with the NRC Senior Resident Inspector led to the conclusion that use of the Equipment Clearance Order is not appropriate to consider the valve secured and as such would require the 31 day verification or appropriate locking device.

CAUSE OF EVENT:

This event was caused by a misuse of the Equipment Clearance Order procedure. Upon further review of the Technical Specification surveillance requirements, it was decided that the intent of the surveillance is that "locked, sealed, or otherwise secured in position" is to ensure a component is physically restrained from movement.

ANALYSIS OF EVENT:

The failure to perform the position verification 31 days after entry into Mode 4 resulted in the violation of Technical Specification surveillance requirement 4.7.4.a and as such, is reportable pursuant to 10CFR50.73(a)(2)(i)(B). Although no firm evidence has been discovered that this occurred on Unit 2, it is believed that this is a programmatic issue and as such there is a high probability that this may have occurred on some of the Unit 2 valves. As such, this Licensee Event Report is being submitted as applicable to both Units 1 and 2. There were no adverse safety or radiological consequences as a result of this event. This event did not produce any additional risk to the public.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
South Texas, Unit 1	05000 498	94	-- 010 --	00	4 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

CORRECTIVE ACTIONS:

The following corrective actions have been taken as a result of this event:

1. A review of the current list of locked valves maintained in position by an Equipment Clearance Order was completed. Technical Specification required valves were limited to the Essential Cooling Water throttle valves for the Component Cooling Water supplemental coolers for Unit 1. The valves in Unit 2 are equipped with locking devices.
2. The Essential Cooling Water throttle valves were added to the surveillance procedure to ensure compliance with Technical Specifications and now these valves are equipped with locking devices.
3. The revised procedure was re-performed for Unit 1 on July 20, 1994.
4. The remaining Technical Specification and non-Technical Specification required components being administratively locked by an Equipment Clearance Order have also been determined to require locking devices. Locking devices have been designed and installed.

ADDITIONAL INFORMATION:

There have been several Licensee Event Reports which have documented the failure to meet Technical Specification required surveillances. Of these, there have been no Licensee Event Reports which have been as a result of a misuse of the Equipment Clearance Order procedure.