

# The Light company

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

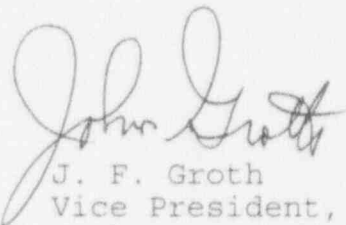
August 22, 1994  
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File No.: G02.04  
10CFR2.201

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

South Texas Project  
Unit 1  
Docket No. STN 50-498  
Reply to Notice of Violation 9410-01  
Regarding Failure to Follow Procedures

Houston Lighting & Power has reviewed Notice of Violation 9410-01 dated July 21, 1994, regarding the five examples of failure to follow procedures, 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  
Vice President,  
Nuclear Generation

MAC/esh

Attachment: Reply to Notice of Violation 9410-01

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IR-94\94-220.001 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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Response to Notice of Violation 9410-01

I. Statement of Violation:

Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Item 1 of Appendix A states that the licensee will have administrative procedures to control safety-related activities. Item 8 states, in part, that specific procedures for surveillance tests should be prepared.

1. Plant Surveillance Procedure 2PSP03-CH-0005, Revision 4, "Essential Chilled Water Pump 21B Reference Values Measurement," Step 2.11 states, in part, that the procedure shall be performed in the sequence written.

Contrary to the above, on April 13, 1994, the steps of the procedure were not performed in the sequence written, in that the inspector observed a reactor plant operator perform Steps 5.18 through 5.25 of Plant Surveillance Procedure 2PSP03-CH-0005 prior to performing Step 5.17.

2. Plant Surveillance Procedure 0PSP02-SI-0963, Revision 0, "Accumulator B Pressure Group 2 ACOT (P-0963)," Step 4.1 states, in part, that whichever unit data package is not applicable to the test to be performed shall be removed and discarded.

Contrary to the above, on April 5, 1994, the Unit 2 data package was not applicable and was not removed and discarded prior to the performance of the test. This resulted in the performance of all prerequisites, precaution, and pretest verifications for the Unit 1 Accumulator B test being documented on the Unit 2 data sheet. Had the test been continued utilizing the wrong data sheet, the results would have been erroneous.

3. Plant Operating Procedure 0POP01-ZQ-0022, Revision 4, "Plant Operations Shift Routine," Step 6.4.2.6 states, in part, that commencing or completing any procedure used to satisfy Technical Specification surveillance requirements which require the shift supervisors's permission to perform shall require entry in the control room logbook.

Contrary to the above, on April 3, 1994, Plant Surveillance Procedure OPSP03-RC-0006, Revision 2, "Reactor Coolant System Surveillance Test," a procedure used to satisfy Technical Specification surveillance requirements, and which required the shift supervisor's permission to perform, was commenced and completed without an appropriate reference in the control room logbook.

4. Plant Operating Procedure OPOP01-ZQ-0022, Revision 4, "Plant Operations Shift Routine," Step 6.4.2.4, states that entry or exit from applicable Technical Specification action statements shall be required entries in the control room logbook.

Contrary to the above, on April 4, 1994, the required entry into Technical Specification Action Statement 3.4.6.26 was not documented in the control room logbook following the failure of a reactor coolant system water inventory balance test.

5. Plant Surveillance Procedure 1PSP03-RH-0007, Revision 5, "Residual Heat Removal System Valve Operability Test (Cold Shutdown)," Step 2.2, states, in part, that the performer shall obtain a calibrated stopwatch, with an appropriate accuracy.

Contrary to the above, on March 16, 1994, a licensed operator failed to obtain a calibrated stopwatch prior to the performance of Procedure 1PSP03-RH-0007, in that he utilized a stopwatch, Identification Number 100-00711 006, that had an expired calibration.

This is a Severity Level IV problem (Supplement I) (498/94010-01)

## II. Houston Lighting & Power Position:

Houston Lighting & Power concurs with cited examples 2 through 5 of this violation. Houston Lighting & Power does not agree with example 1.

III. Reason for Violation and Corrective Actions:

Houston Lighting & Power recognizes that the examples indicate a weakness exists in implementation of administrative procedures. The examples do not meet management's expectation regarding adherence to administrative procedures. The specific causes and corrective actions for each of the examples are listed below:

1. a. Houston Lighting & Power does not agree that example one was a procedural violation. The reactor operator in the control room was controlling the evolution. While waiting for the vibration technician to arrive, the reactor plant operator reviewed the upcoming steps (data taking) to assure that the pump was operating correctly. The controlling procedure in the control room was not signed off. Once the vibration technician arrived, testing was recommenced at step 5.17 and all steps were completed in sequence.  
b. No corrective actions were required.
2. a. In the second example, the uses of the wrong Unit data sheet was caused by inadequate self-checking by personnel who prepared and implemented the work package. Although the procedure step (0PSP02-SI-0963, step 4.1) was violated, it should be noted that an established barrier, the Reactor Operator signing for "inoperable", prevented the wrong data package from being implemented in the field.  
b. This inappropriate action was discussed with Instrument & Control crews. The individual who gave work start was appropriately counseled. Human factor enhancements were identified and interim measures are being taken until the Instrument & Control procedures are revised as part of the surveillance procedure enhancement project. These interim measures included stamping data packages with a larger red Unit designator and requiring the administrative supervisor to verify the appropriate data package is stamped.
3. a. In the third example, no references were made in the control room log for the reactor coolant system surveillance test due to the lack of attention to detail. This reactor coolant system surveillance was being performed every 24 hours per management directive. (Note: Technical Specifications requires performance of this procedure once every 72 hours.) Management unintentionally allowed this to become a routine evolution and subsequently, logging of the start of this test was overlooked.

- b. Shift briefing was provided to the control rooms on how to make proper surveillance log entries. In addition, the surveillance scheduling procedure requires a work start authorization from the operational authority only when the surveillance test procedure involves manipulation of a system or component. The reactor coolant system inventory surveillance does not involve manipulations, thus does not require operational authority to commence testing. The surveillance procedure was revised to no longer require Shift Supervisor approval to commence testing.
- 4. a. In the fourth example, the original reactor coolant system water inventory was determined to be an invalid test, not an unsatisfactory test. The log entry was not clear on this situation.
- b. Management has increased monitoring and feedback on log entries.
- 5. a. In the fifth example, the uses of an out of calibration stopwatch during surveillance testing was caused by inadequate self-checking. The stopwatch was used the day after the calibration had expired. Although a recall past due notice had been issued that same day, the equipment was still utilized for the test. Management expectations for test preparation i.e., utilizing available calibrated test equipment, was not met. Additionally, self-checking was not performed when entering the calibration due date on the data sheet.
- b. The individual involved was counseled.

#### IV. Generic Corrective Actions:

To address the generic issues associated with the cited examples, management has strengthened field procedure adherence by reinforcing self-checking and attention to detail. The surveillance procedure enhancement program is ongoing which will improve the quality of the surveillance procedures. This continuing upgrade should remove unneeded details and requirements. In addition, a module on procedure usage is being presented in supervisor continuing training. This module discusses management expectations for procedure usage, with a specific topic being "Use of Administrative Procedures". Lastly, to communicate management's expectations, there has been increasing management and supervision presence in the field.

#### V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.