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

September 29, 1994
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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
Replies to Notice of Violation in
Inspection Report 94024 Regarding Failure
to Perform a Technical Specification Required
Surveillance and Regarding Failure to Fully Meet
the Requirements of Technical Specifications

Houston Lighting and Power has reviewed Notice of Violations 9424-01 and 9424-02 dated August 30, 1994, regarding a failure to perform a Technical Specification required surveillance due to inappropriate use of the equipment clearance order process and failure to fully meet the requirements of Technical Specifications due to an inadequate surveillance procedure, respectively, and submits the attached replies.

In your cover letter, a request was made to discuss the extent and appropriateness of using equipment clearance order danger tags in lieu of mechanical locking devices and the status of the surveillance enhancement program.

As noted in our attached response, Houston Lighting and Power no longer considers the use of equipment clearance order danger tags as an acceptable method to control valves under the locked valve program. The Technical Specification valves that were utilizing an equipment clearance order danger tag have been equipped with locking devices. The controlling procedure has been changed to no longer allow the equipment clearance order danger tags to be used as an administrative lock. A bulletin was issued to reiterate management expectations.

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With regard to the surveillance enhancement program, the scope currently encompasses approximately eleven hundred Technical Specification surveillance procedures. The project includes the development of a basis document for selected surveillance procedures to ensure that the Technical Specification and Updated Final Safety Analysis Report requirements are clearly identified. The procedures that have been revised to date were selected based on either being complex procedures with the possibility for causing an unwanted transient or had proven to be difficult to use in the past. The lessons learned while enhancing these surveillance procedures are being incorporated into the on-going upgrade process. In 1994 more than a hundred additional procedures have been reviewed thus far. Although technical deficiencies were identified, none resulted in a reduction in the margin to safety. Approximately two hundred procedures are scheduled to be enhanced in 1994. At the end of 1994, a review will be performed to determine the appropriate scope and schedule for 1995. The enhancement of the remaining surveillance procedures is scheduled to be completed in 1998.

We understand and appreciate your concerns on these matters and we will continue to improve our programs as we progress up the path to be a world class performer. 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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Attachments: 1. Reply to Notice of Violation 9424-01

2. Reply to Notice of Violation 9424-02

c:

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Reply to Notice of Violation 9424-01

I. Statement of Violation:

Technical Specification 4.7.4 states, in part, that at least three essential cooling water loops shall be demonstrated operable 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.

Contrary to the above, on July 13, 1994, Valve 1-EW-0105, an essential cooling water system valve servicing safety-related equipment, was not demonstrated operable in that it had not been verified to be in its correct position since March 13, 1994, and it was not locked, sealed, or otherwise secured in position.

This is a Severity Level IV violation (Supplement I) (498/94024-01).

II. Houston Lighting and Power Position:

Houston Lighting and Power concurs that the violation occurred.

III. Reason for Violation:

The failure to verify the position of the Essential Cooling Water valve was caused by misuse of the equipment clearance order process.

The Essential Cooling Water throttle valve was considered locked in its required position by having a equipment clearance order tag hung to ensure that the valve was administratively controlled. Since the valve was considered administratively locked under the locked valve program, the valve was excluded as a valve needing to be verified as allowed by Technical Specification 4.7.4. Upon further review of the Technical Specification exclusion allowance, it was decided that the intent of the surveillance wording, "locked, sealed or otherwise secured in position", is to ensure a component is physically restrained from movement. The practice of utilizing equipment clearance order tags to administratively lock valves was determined to not meet the intent of the Technical Specification. Thus, with the valve not being physically locked and the valve excluded from the Technical Specification 4.7.4 surveillance procedure, the required position verifications were not performed.

IV. 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 utilizing an equipment clearance order tag were limited to the Essential Cooling Water throttle valves for the Component Cooling Water supplemental coolers for Unit 1. The same valves in Unit 2 are equipped with locking devices.

2. The Essential Cooling Water throttle valves were added to the surveillance procedure. The revised procedure was performed for Unit 1 on July 20, 1994 to place Unit 1 in compliance with Technical Specifications.

3. The Essential Cooling Water throttle valves in Unit 1 are also now equipped with locking devices.

4. The controlling procedure has been changed to no longer allow the equipment clearance order danger tags to be used as an administrative lock. A bulletin was issued to reiterate management expectations.

5. The remaining 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. Equipment Clearance Orders are no longer used to control valves under the locked valve program.

V. Date of Full Compliance:

Houston Lighting and Power is in full compliance.

Reply to Notice of Violation 9424-02

I. Statement of Violation:

Technical Specification 4.3.3.6 states that each accident monitoring instrumentation channel shall be demonstrated operable by performance of the channel check and channel calibration at the frequencies shown in Table 4.3-7. Table 4.3-7, Items 13 and 14, require that channel checks of the containment water level instrumentation be performed on a monthly basis.

Technical Specification 1.6 defines a channel check as the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication, and/or status with other indications, and/or status derived from independent instrument channels measuring the same parameter.

Contrary to the above, on May 25, 1994, a qualitative assessment of the Unit 2 reactor containment building normal sump level channel behavior was not performed in that the control room indication observed was reading down scale low. On June 22, licensed operators determined that the power supply breaker for this channel had been open.

Also contrary to the above, on April 20 and again on May 18, 1994, a qualitative assessment of the Containment Wide Range Water Level Channel 1-LT-3925 behavior was not performed in that the control room indication observed was reading down scale low. On July 11, after further evaluation of the channel's performance, licensed operators declared the channel inoperable.

This is a Severity Level IV violation (Supplement I) (498;499/94024-02)

II. Houston Lighting and Power Position:

Houston Lighting and Power concurs that the violation occurred.

III. Reason for Violation:

The cause of these events was determined to be an inadequate surveillance procedure. This procedure did not provide adequate guidance to allow detection of inoperable channels.

Operability of the secondary sump level channel and the wide range level channel is verified by performing a qualitative assessment of the Qualified Display Processing System readings. Previous surveillances performed on these channels indicated a "↓ LO" reading. A "↓ LO" reading is displayed by the Qualified Display Processing System when the input data is below the designated indication range. The affected instrument may be in tolerance, but since it is reading below its expected range, it displays "↓ LO". The Qualified Display Processing System does not distinguish between an inoperable circuit and an in tolerance below range reading. The surveillance procedure did not provide guidance to the operators to distinguish between an operable and inoperable channel when Qualified Display Processing System is reading "↓ LO".

IV. Corrective Actions:

On June 21, 1994, the breaker for the Containment secondary sump narrow range level indicator was shut and power restored to the instrument. The surveillance was successfully performed.

The following corrective actions have been or will be implemented:

1. The surveillance was performed on both Units 1 and 2, to reevaluate whether the indication was adequate for determining operability. It was determined the Reactor Containment Building Wide Range Level instruments (one per unit) had not been adequately evaluated for operability by the existing surveillance.

2. The Reactor Containment Building Wide Range Level instruments have been declared operable and Technical Specification 3.3.3.6 was exited on July 19, 1994, at 1157 hours for Unit 2 and July 21, 1994 at 1412 hours for Unit 1.

3. The surveillance procedure was revised to provide adequate guidance to ensure instrument operability.

4. This event and the need to monitor for abnormal, excessively low or high channel readings during surveillance testing were reviewed with Operations and Maintenance personnel.

V. Date of Full Compliance:

Houston Lighting and Power is in full compliance.