

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

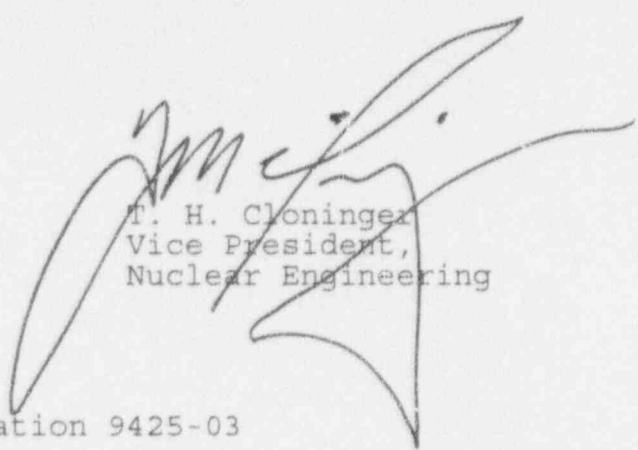
October 27, 1994
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498; STN 50-499
Reply to Notice of Violation 9425-03
Regarding Failure to Perform a 10CFR50.59 Evaluation

Houston Lighting and Power has reviewed Notice of Violation 9425-03 dated September 29, 1994, regarding a failure to perform a 10CFR50.59 Evaluation for Plant Change Forms which revised the setpoint of the Unit 1 and Unit 2 Reactor Coolant Pumps No. 2 seal leak off-flow switches, 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) 972-8787.



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MAC/pas

Attachments: Reply to Notice of Violation 9425-03

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Project Manager on Behalf of the Participants in the South Texas Project

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Reply to Notice of Violation 9425-03

I. Statement of Violation:

Technical Specification Section 6.5.3.1.b states that proposed changes to safety-related structures, systems, and components shall be reviewed. Section 6.5.3.1.e states that each review will include a determination of whether or not an unreviewed safety question is involved.

Inter-Departmental Procedure IP-3.20Q, "10 CFR 50.59 Evaluations," Revision 6, Section 3.11, states that for physical changes a written evaluation is performed to provide a basis for a determination of whether or not an unreviewed safety question evaluation is to be performed.

Contrary to the above, before August 12, 1994, Plant Change Forms 168211A and 168212A were issued and revised the setpoints for Units 1 and 2 Reactor Coolant Pumps No. 2 seal leak off-flow switches without a written evaluation being performed providing a basis for a determination of whether or not an unreviewed safety question evaluation was to be performed.

This is a Severity Level IV violation (498;499/9425-03) (Supplement I).

II. Houston Lighting and Power Position:

Houston Lighting and Power concurs that the violation occurred.

III. Reason for Violation:

The reason for the violation was failure to follow procedures in that no 10CFR50.59 evaluation was performed for the setpoint change. The failure was due to the improper dispositioning of Plant Change Forms as rework which allowed the design change not to receive a 10CFR50.59 evaluation.

On October 25, 1993, Plant Change Forms 168211A and 168212A were processed to address the resetting of the Reactor Coolant Pumps No. 2 seal flow to the values given in the Vendor's Technical Manual. The Vendor's Technical Manual had been revised in 1990 to incorporate a vendor product update which changed the setpoint. The disposition of the Plant Change Forms was determined to be rework since the setpoint change was already specified in an approved design document, the Vendor's Technical Manual. With the Plant Change Forms mis-classified as rework, the governing procedure did not require a 10CFR50.59 evaluation.

IV. Corrective Actions:

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

1. A 10CFR50.59 evaluation was performed for the setpoint change identified in Plant Change Forms 168211A and 168212A. No Unreviewed Safety Questions were identified in this review.
2. A review of the Plant Change Form Data Base, one thousand thirty seven Plant Change Forms, was performed to identify all Plant Change Forms that were dispositioned as rework. Those identified Plant Change Forms were reviewed to determine if they had the proper disposition classification, if they received a screening for 10CFR50.59 applicability, if they required a screening for 10CFR50.59 applicability and if they required an Unreviewed Safety Question Evaluation.

The results of this engineering review revealed forty-six Plant Change Forms classified as Rework which had resulted in plant physical changes and were not screened for 10CFR50.59 applicability. The forty-six Plant Change Forms identified have subsequently had a 10CFR50.59 screening form completed and no Unreviewed Safety Question Evaluations were necessary.

3. To ensure consistent conservative performance at this time, Engineering has distributed a bulletin to Engineering personnel describing this event and instructing personnel to perform a screening for 10CFR50.59 applicability for every engineering documentation change which involves physical configuration change.
4. Engineering will develop and provide training on nonconformance classification and the requirements for needing a 10CFR50.59 evaluation. These actions will be completed by December 15, 1994.

V. Date of Full Compliance:

Houston Lighting and Power is in full compliance.