

# The Light company

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

June 20, 1991  
ST-HL-AE-3/92  
File No.: G02.04  
10CFR2.201

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

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498 and 50-499  
Reply to Notices of Violation 9111-01 and 9111-02  
Failure to Properly Implement Locked Valve Program and Work Hour  
Requirements Exceeded Without Proper Authorization or Documentation

Houston Lighting & Power Company has reviewed the Notices of Violation issued as a result of NRC Inspection Report 91-11 dated May 21, 1991 and submits the attached reply.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628.

*William J. Jump*  
William J. Jump  
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Nuclear Licensing

RAD/sgs

Attachment: Reply to Notices of Violation 9111-01 and 9111-02

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Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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LA/NRC/

I. Statement of Violation:

1. TS 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33 requires administrative procedures for the control of equipment (e.g., locking). The following are examples observed by the inspectors of the failure to properly implement procedures:

- (a) Procedure OPGP03-ZO-0027, Revision 7, Section 1.3, states, in part that "[i]n no case are permanent plant devices [to be] 'secured in position' by removal of the components' operators, or by locking the valves to piping, tubing, conduits, cables, or other valves." [sic]

Contrary to the above, on March 29, 1991, permanent plant valves 1-SI-0097A, 1-SI-0097B, 1-SI-0097C, 1-SI-0120A, 1-SI-0120B, 1-SI-120C, 1-SI-0121A, 1-SI-0121B, 1-SI-121C, and 1-CV-0572 (10 valves) were found with their handwheels locked to other valves. Valves 2-SI-0051A [sic], 2-SI-0051B [sic], 2-SI-0051C [sic], 2-SI-0097C, 2-SI-0120A, 2-SI-0120B, 2-SI-0120C, 2-SI-0121C, 2-CV-0572, 2-BR-0035, and 2-BR-0037 (11 valves) were found with their handwheels (component operators) removed.

- (b) Procedure OPGP03-ZO-0027, Revision 7, identifies the requirements for locking valves and identifies which valves are required to be locked. Checklist OPGP03-ZO-0027-1 requires that the containment spray system Spray Additive Tank 1A isolation valve, 1-CS-0017A, be locked open.

Contrary to the above, on March 2, 1991, Valve 1-CS-0017A was found open but not locked.

This is a Severity Level IV violation. (Supplement I)  
(498/9111-01; 499/9111-01)

2. Technical Specification 6.2.2.f requires, in part, that "during extended periods of shutdown for refueling . . . , on a temporary basis, the following guidelines shall be followed: an individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time. Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation." These requirements are implemented by Procedure OPGP02-ZA-0060, "Overtime Approval Program."

Statement of Violation: (cont'd)

Contrary to the above, during February 1991, four Unit 1 supervisors and, during March 1991, two Unit 1 shift supervisors all exceeded 72 hours in a 7-day period without authorization by the Plant Manager or his deputy, or higher levels of management. No documentation of the basis for exceeding the regulatory guideline was provided.

This is a Severity Level IV violation. (Supplement I)  
(498/9111-02)

II. Houston Lighting & Power Position:

1. HL&P concurs that the cited violation occurred with the exception of the valves found with handwheels removed. Refer to the discussion provided in Section III below.
2. HL&P concurs that this violation occurred.

III. Reason for Violations:

Both violations were caused by a failure to adhere to procedural controls and requirements.

1. The ten (10) valves described as "found with their handwheels locked to other valves" were in conflict with procedural requirements. The situation was reviewed in relation to locking requirements and no basis for the requirement was found, subsequently the requirement was removed from the procedure. The valves were found locked in conflict with the procedure, however, all other requirements of the locked valve program were met.

Nine (9) of the eleven (11) valves described as "found with their handwheels removed" were remotely operated valves whose operators do not have handwheels. Please note, the valve numbers 2-SI-0051A, B and C listed in the violation are actually 2-SI-0059A, B and C. Reach rods are attached due to the requirement for remote access. The valves were danger tagged to prevent operation and were therefore in compliance with OPGF03-ZO-0027 which allows the use of clearance orders to administratively lock certain valves. Therefore, this issue is not considered a violation of the locked valve program requirements. Valves 2-BR-0035 and 2-BR-0037 were not included in the Locked Valve Program and therefore the requirements of OPGF03-ZO-0027 did not apply.

Reason for Violation: (cont'd)

The Spray Additive Tank 1A isolation valve 1-CS-0017A was found with the lock wire inadvertently arranged so that it could be manually removed from the secondary point of attachment. This would not have physically prevented all movement of the valve operator. In addition, the wire was placed around the piping which was in conflict with the procedure. The requirement to ensure that valve operators are not secured to piping has subsequently been found to be without basis and removed from the procedure.

2. The request for plant management approval for the four (4) unit supervisors to exceed overtime requirements was submitted in accordance with procedure OPGP02-ZA-0060, "Overtime Approval Program". However, the documentation for the request has not been found and is not in the records storage vault. No administrative requirements were provided to assure that overtime was not worked prior to receipt of approval.

The second example cites two shift supervisors who exceeded the overtime requirements without proper authorization. Review of the March 1991 shift schedule identified two shift supervisors who worked 80 hours in a 7-day period without proper authorization. The shift schedule was revised to provide shift coverage due to an unforeseen emergency. There were no administrative controls in place to review and approve changes to a previously approved shift schedule.

IV. Corrective Actions:

The issue of procedural adherence will be further addressed as a result of a recent HL&P Nuclear Assurance Department Deficiency Report on this subject.

- 1A. The individuals involved in incorrectly locking and verifying valve 1-CS-0017A have been counseled.
- B. The following actions are being taken to improve the understanding and implementation of the Locked Valve Program:
  - i. The Locked Valve Program procedures will be revised to more clearly outline the purpose of the Locked Valve Program and to clarify the locking requirements. This action will be completed by August 1, 1991.
  - ii. A review of the locked valves identified on Piping and Instrument Diagrams (P&IDs) and those valves identified in the Locked Valve Program procedures was conducted to resolve any inconsistencies.



Corrective Actions: (cont'd)

- iii. System operating procedures were reviewed to ensure that all those valves which are operationally required to be locked were in the Locked Valve Program.
  - iv. The locked valve requirements were reviewed which resulted in the removal of a large number of components from the Locked Valve Program which have no regulatory or operational requirements to be locked.
  - v. Any corrections necessary as a result of these reviews will be completed by September 18, 1991.
- 2A. A memorandum was issued to Plant Operations personnel stressing the requirements of Technical Specification 6.2.2.f and procedure OPGP02-ZA-0060, "Overtime Approval Program". The memorandum also emphasized the importance of control of quality documents.
- B. Administrative Controls will be established to assure that overtime in excess of Technical Specification 6.2.2 requirements is not worked prior to receipt of documented plant management approval. This will be completed by July 26, 1991.

V. Date of Full Compliance:

- 1. HL&P is in full compliance at this time.
- 2. HL&P is in full compliance at this time.