

The Light company

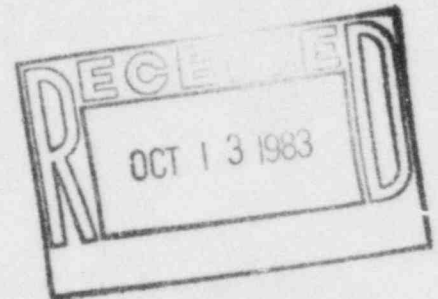
Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

October 7, 1983
ST-HL-AE-1016
File Number: G2.4/B4.1

Mr. John T. Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Mr. Collins:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation



Pursuant to the provisions of 10CFR2.201 enclosed is Houston Lighting & Power Company's response to the Notice of Violation 50-498/83-17, 50-499/83-17 dated September 7, 1983.

If you should have any questions regarding this matter, please contact Mr. Michael E. Powell at (713) 877-3281.

Very truly yours,

G. W. Oprea, Jr.
G. W. Oprea, Jr.
Executive Vice President

LJK:clm
Attachment

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PDR ADOCK 05000498
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Houston Lighting & Power Company

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Page 2

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Revision Date 09-26-83

South Texas Project
Units 1 & 2
Response to Notice of Violation

I. STATEMENT OF APPARENT VIOLATION

10 CFR Part 50, Appendix B, Criterion VIII states that measures shall be established for the identification and control of materials, parts, and components. These measures shall assure that identification of the item is maintained throughout fabrication, erection, installation, and use of the item.

HL&P Quality Assurance Program Description (QAPD), Revision 4, Part A, Section 8.0, requires that contractors and suppliers establish written procedures which identify, control, and ensure traceability of materials, parts, and components. These procedures require a method for identification of quality related materials and parts to provide traceability to the appropriate drawings, specifications, purchase orders, manufacturing and inspection documents, deviation reports, and physical and chemical mill test reports.

Contrary to the above, Bechtel Specification 3A010SS0030, Revision 1, SCN 10, does not require part traceability in that Subsection 3.1 states, in part: "Material used for field-fabricated items shall be obtained from a jobsite material source controlled by the Construction Manager. The material source control shall consist of documentation of jobsite-received material by certified material test reports (identified by heat numbers) or material certificates of compliance, as allowed by the project specifications, and retention of the documents traceable to the lot of material received. Retention of records or marking of pieces in order to trace individual erected pieces of field-fabricated items against specific material test reports from the material lots is not mandatory."

Bechtel Procedure WPP/QCI 12.4, Revision 2, states that the identification of material will be accomplished by means of color-code painting of the material to indicate intended end-use. No identification of parts or components to indicate various grades, heats, or lots of material is mentioned.

II. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The provisions of the HL&P QAPD regarding identification and control of materials, parts and components are intended to meet the requirements of 10 CFR 50, Appendix B Criterion VIII and of appropriate codes and standards. A review of Section 8 of the QAPD indicates that the current wording is not clear and is thus subject to misinterpretation.

HL&P recognizes that there have been problems in implementing the materials control program for materials used for field-fabricated items at the South Texas Project. These problems stem from an unusually complicated materials classification system. The color-codes required

by Bechtel Procedure WPP/QCI 12.4 Revision 2 were the result of Bechtel's efforts to simplify the program. HL&P agrees that there were weaknesses in these procedures which brought about the problems identified by Region IV inspectors in NRC Inspection Report 50-498/83-17, 50-499/83-17.

The Bechtel procedure WPP/QCI 12.4 and the companion Ebasco procedure ASP-5 were revised on August 31, 1983, to clarify and simplify material marking and to specify marking material by grade. In accordance with the revised procedures, safety grade structural shapes are color-coded red-gray. Where material grade could be misinterrupted, that material is ribbon-striped to positively identify grade.

HL&P believes that Bechtel Specification 3A010SS0030, Revision 1, SCN 10, is in compliance with the requirements of 10 CFR 50, Appendix B, Criterion VIII.

The material identification and control program is designed to provide identification and traceability control as specified by codes (i.e., ASME Section III), standards (i.e., ASTM, ANSI), and specifications that include specific identification or traceability requirements such as: identification or traceability of the item to specification and grade of material; heat, batch, lot, part or serial number; or specified inspection, or tests; as applicable.

Category I structural and miscellaneous material source control consists of documentation of jobsite-received material by certified material test reports (identified by heat numbers) or material certificates of compliance as per the project specifications and retention of the documents traceable to the lot of material at the time of receipt.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The HL&P Quality Assurance Program Description, Part A, Revision 4, Section 8, is being revised to include a clarification of the project requirements for identification and control of materials to be used for field fabricated items.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

HL&P believes that the revised Bechtel and Ebasco procedures are in compliance with regulatory requirements regarding identification and control of materials, parts and components. To clarify project requirements in this area Revision 5 of the QAPD will be submitted to the NRC by November 1, 1983.