

The Light company

Houston Lighting & Power

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

February 26, 1992

ST-HL-AE-4004

File No.: G02.04

10CFR2.201

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

South Texas Project
Unit 2

Docket No. STN 50-499

Reply to Notice of Violation 9130-01

Regarding Failure to Depressurize Reactor Coolant

Pump 2C Oil Return Line Following Local Leak Rate Testing

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9130-01 dated January 29, 1992, and submits the attached reply.

If you should have any questions, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7205.

William J. Jump
William J. Jump
Manager,
Nuclear Licensing

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Attachment: Reply to Notice of Violation 9130-01

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A Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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cc:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
c/o U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

D. E. Ward/T. M. Puckett
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
P.O. Box 1088
Austin, TX 78767

K. J. Fiedler/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61867
Houston, TX 77208

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 10/11/91

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I. Statement of Violation:

Failure to Follow Procedural Requirements

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 8.b(1)(c) of Appendix A requires that containment local leak tests be performed in accordance with specific procedures. This is accomplished, in part, by Procedure OPSP11-PO-0001, Revision 2, "Local Leakage Rate Test Penetration: M-75 RCP Oil Return Line."

Step 6.6.8 of Procedure OPSP11-PO-0001 requires technicians to "Depressurize the piping by opening and closing the test connection (PO-0236)" after obtaining the leakage rate measurements.

Contrary to the above, on November 6, 1991, technicians performing the local leakage rate test on Penetration M-75 did not depressurize the piping after obtaining the leakage rate measurements. On December 4, 1991, during the performance of a service request to lower reactor coolant pump motor lubrication oil, the unvented pressure caused a loss of lubrication to the lower radial bearing of the Reactor Coolant Pump 2C motor. As a result, the bearing had to be replaced.

This is a Severity Level IV violation. (Supplement I)
(499/9130-01)

II. Houston Lighting & Power Position:

L&P concurs that the violation occurred.

III. Reason for Violation:

The loss of lubrication oil to the Reactor Coolant Pump (RCP) 2C lower bearing during maintenance and subsequent replacement of the bearing was caused by the failure to vent the RCP oil return line in accordance with the procedure following Local Leak Rate Testing (LLRT) of the associated containment isolation valves. A contributing factor was that work instructions to drain the oil were inadequate.

IV. Corrective Actions:

1. A discussion of this event was conducted with the individuals responsible for performing Local Leak Rate Testing (LLRT) with emphasis on the importance of procedural adherence.
2. A review was conducted by engineering personnel of the as left configuration of systems following LLRT and subsequent venting and filling of the system prior to return to service. No other problems were identified.
3. The LLRT surveillance procedures for the RCP oil supply and return lines will be revised to provide a signoff step on the datasheet to indicate that the piping has been vented following the LLRT. The remaining LLRT procedures have been evaluated and appropriate procedures will be revised to provide a signoff step on the datasheet to indicate that the system has been vented. This action will be completed by July 9, 1992.
4. Procedure OPMP05-RC-0004 "Reactor Coolant Pump Motor Removal, Inspection and Replacement" has been revised to include specific standard work instructions for adding or draining lubrication oil.
5. The Maintenance Department has issued guidance to appropriate maintenance personnel on adjustment of oil levels on large motors. The guidelines prohibit adding or draining oil when the pump is running except when critical to the proper operation of the motor and then only with the specific approval of the Shift Supervisor. The standard practice is limited to making oil level adjustments when the pump is secured.
6. A training bulletin has been issued to appropriate operations personnel describing this event and the concern of adjusting oil level on running pumps.

V. Date of Full Compliance:

Primary corrective measures are in place. Remaining actions are considered further enhancement. As such, HL&P is in full compliance at this time.