

The Light company

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

June 19, 1992

ST-HL-AE-4129

File No.: G02.04

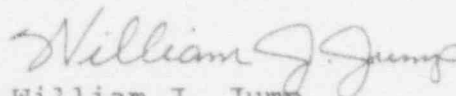
10CFR2.201

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

South Texas Project
Unit 1
Docket No. STN 50-498
Reply to Notice of Violation 9208-02
Regarding Failure to
Tag Breakers Associated with Inactive Components

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9208-02 dated May 22, 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
Manager,
Nuclear Licensing

RAD/ag

Attachment: Reply to Notice of Violation 9208-02

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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

L4/NRC/

I. Statement of Violation:

Failure to Follow Procedure

Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. RG 1.33, Appendix A, Item 1.c. requires administrative procedures for equipment control (tagging). This is accomplished by OPGP03-ZO-0039, Revision 1, "Configuration Management."

Step 1.2.1 of OPGP03-ZO-0039 states that the equipment clearance program prevents component or system operation when the operation of the component might cause personnel injury or equipment damage.

Contrary to the above, on April 1, 1992, during an NRC walkdown of Equipment Clearance Order (ECO) 1-92-502, four electrical circuit breakers were not tagged. The four circuit breakers were associated with the Unit 1 Train A essential cooling water system to essential chilled water system chiller outlet valves that were previously removed by the implementation of a temporary modification. The failure to follow the configuration control procedure resulted in a potential personnel and equipment hazard because no controls were in place to ensure that the four electrical circuits remained de-energized.

This is a Severity Level IV violation. (Supplement I)
(498/9208-02)

II. Houston Lighting & Power Position:

HL&P concurs that the violation occurred.

III. Reason for Violation:

The Temporary Modifications procedure OPGP03-ZO-0003 does not provide specific guidance regarding determination of power cables. The cables associated with the four essential chilled water system chiller outlet valves were determined, retracted to the nearest cable pull box and insulated; however, there were no provisions in either the temporary modification or work package implementing the temporary modification regarding control of the component power supplies.

IV. Corrective Actions:

1. The four power supplies were added to the equipment clearance order and tagged to ensure proper control of the power supplies on April 1, 1992.
2. The Temporary Modifications procedure will be revised to require the system engineer to accept responsibility for Equipment Clearance Orders which are required to remain in place after the installation of a temporary modification to ensure proper controls are maintained. This will be completed by August 28, 1992.
3. A review of existing temporary modifications has been conducted with emphasis placed on similar types of power cable modifications which indicates that this was an isolated occurrence.

V. Date of Full Compliance:

HL&P is in full compliance at this time.