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

March 21, 1996
ST-HL-AE-5316
File No.: G02.04.02
10CFR2.201

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Unit 2
Docket No. STN 50-499
Reply to Notice of Violation 9612-01 Regarding
Failure to Follow Surveillance Test Procedure Requirements

South Texas Project has reviewed Notice of Violation 9612-01, dated February 20, 1996, regarding failure to declare the surveillance test of the solid state protection system unsatisfactory after observing that Safety Injection System Valve SI-MOV-0016B did not open as required to satisfy the acceptance criteria of the surveillance procedure. The response to this Notice of Violation is attached. The event did not have an adverse effect on the health and safety of the public.

If there are any questions regarding this matter, please contact Mr. S. M. Head at (512) 972-7136 of me at (512) 972-7988.

R. E. Masse
Unit 2 Plant Manager

250108

KJT/

Attachment: Reply to Notice of Violation 9612-01

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

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JE01

c:

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Reply to Notice of Violation 9612-01

I. Statement of Violation:

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, recommends, in part, that procedures for surveillance tests and control of repair work be established covering emergency core cooling and reactor protection systems.

Procedure 0PSP03-SP-0009B, "SSPS Actuation Train B Slave Relay Test," Revision 5, implements surveillance test requirements. Step 5.6.26 states, in part, "At CP001, verify the following Control Room indications: . . . 'CNTMNT SUMP TO SI SUCT HDR ISOL MOV-0016B' - open."

Procedure 0PGP03-ZE-0004, "Plant Surveillance Program," Revision 15, further implements surveillance test requirements. Step 4.4.6 states, "IF surveillance test results are unsatisfactory or do not meet the acceptance criteria, as specified by the surveillance procedure, THEN the surveillance is considered failed (unsatisfactory) and the Shift Supervisor is notified. Furthermore, IF the test data obtained during the performance of a surveillance test indicates that the acceptance criteria will not be satisfied, THEN the surveillance, once completed, is considered failed (unsatisfactory)."

Contrary to the above, on December 23, 1995, during the conduct of a surveillance on the solid state protection system, the crew failed to declare the surveillance test unsatisfactory after observing that the Safety Injection System Valve MOV-0016B did not open as required to satisfy the acceptance criteria of Step 5.6.26 of Procedure 0PSP03-SP-0009B, Revision 5. The breaker for the valve motor tripped when an open signal was sent to the valve.

This is a Severity Level IV violation (Supplement I)(499/9612-01).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The root cause of this occurrence was failure to follow management expectations as stated in Policy Number 9, "Response to Alarms and Abnormal Indications", of the Operations Policies and Practices Manual. This failure resulted in a violation of procedure 0PGP03-ZE-0004, "Plant Surveillance Program".

Substep 4.4.6.1 of Procedure 0PGP03-ZE-0004, *"Plant Surveillance Program,"* allows an exception to the requirements in step 4.4.6. This exception notes that actions can be taken to correct a deficiency and the test completed satisfactorily if the deficiency can be corrected by actions of an operator or the test coordinator without the generation of an additional/external documentation and not within the scope of existing deficiency programs. The breaker to Safety Injection System Valve SI-MOV-0016B was closed without generation of documentation and the motor-operated valve cycled open in response to the slave relay test signal. By closing the circuit breaker and observing expected motor-operated valve response, the deficiency was considered corrected and the exception criteria correctly applied.

Operations Policy Number 9 of the Operations Policies and Practices Manual, *"Response to Alarms and Abnormal Indications,"* states, in part, that *"operating personnel shall know the cause of trips before resetting protective devices, (e.g. circuit breakers, fuses, reactor protection channels, and ESF channels), when these devices trip."* Although the circuit breaker to SI-MOV-0016B was reset and the motor-operated valve subsequently cycled open, the cause of the initial tripping of this breaker had not been determined when the exception to step 4.4.6 of Procedure 0PGP03-ZE-0004 was applied. The deficiency noted (i.e. the initial tripping of SI-MOV-0016B circuit breaker) during the surveillance testing had not been resolved and the exception to step 4.4.6 could not be used in this occurrence.

The relays being tested in Procedure 0PSP03-SP-0009B, "SSPS Actuation Train B Slave Relay Test" performed as designed. The Safety Injection System Valve SI-MOV-0016B failed to cycle open to satisfy acceptance criteria because the valve's power supply breaker tripped open. The breaker to SI-MOV-0016B is not an attendant electrical power component of the Solid State Protection System. Valve SI-MOV-0016B automatically opens on low level in the Refueling Water Storage Tank under accident conditions to supply the B Train Safety Injection and Containment Spray pumps with a continuous suction from the Containment Emergency Recirculation Sumps. This valve is not required in the initial injection phase of an accident.

Subsequent investigation resulted in replacement of the breaker to SI-MOV-0016B on December 26, 1995.

IV. Corrective Actions:

The lessons learned from this occurrence have been issued to licensed operators.

Understanding of policies and practices will be strengthened through the training of licensed operators on the improved guidance incorporated in the new Conduct of Operations document that will replace the Operations Policies and Practices Manual. This action will be completed by May, 1996.

Procedure 0PGP03-ZE-0004, *"Plant Surveillance Program,"* Step 4.4.6.1 will be enhanced by May, 1996 with improved guidance for situations occurring that result in the indication of the surveillance test acceptance criteria being indeterminate.

V. Date of Full Compliance:

South Texas Project is in full compliance.

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

VI. Additional Information:

References: Letter from T. H. Cloninger to the NRC Document Control Desk dated February 22, 1995 (ST-HL-AE-4994)

Letter from S. E. Thomas to the NRC Document Control Desk dated October 16, 1995 (ST-HL-AE-5199)

The referenced letters discussed South Texas Project's plan for developing formal calculations to determine the optimal instantaneous trip settings for molded case circuit breakers based on the parameters established in Information Notice 92-51 Supplement 1 and current IEEE standards. Subsequent to the tripping of the molded case circuit breaker for SI-MOV-0016B on December 23, 1995, the plan has been revised based on risk contribution of each motor load to the safe operation of the facility. A prioritization schedule is being developed to revise breaker trip settings at the first reasonable opportunity that supports plant operations. Design Change Packages have been issued for all High Risk category motor-operated valves and Design Change Packages for Medium Risk and Low Risk category motor-operated valves, which have 24 or 72 hour Limiting Conditions for Operation windows, are being developed .

On February 14, 1996 the breaker to MOV-0031C, RHR 2C Cold Leg Injection Valve tripped open during the performance of surveillance test 0PSP03-RH-0009, "Residual Heat Removal System Valve Operability Test". The safety-related motor operated valve was declared inoperable and Technical Specification 3.5.2 was entered. The breaker was replaced, post maintenance testing was satisfactory and the Action A of Technical Specification 3.5.2 was exited on February 15, 1996.