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

October 07, 1992

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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 9224-02
Regarding Inadequate Restoration of Control Room Envelope
Ventilation System Due to Procedure Deficiency

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9224-02 dated September 10, 1992, and submits the attached reply.

If you 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
General Manager,
Nuclear Licensing

RAD/ag

Attachment: Reply to Notice of Violation 9224-02

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Revised 10/11/91

L4/NRC/

I. Statement of Violation:

Failure to Have Appropriate Procedures

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. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances. One example of violating this requirement is stated below:

1. Regulatory Guide 1.33, Appendix A, Item 3.P, requires procedures for the control room heating and ventilation system. This is implemented, in part, by Procedure 2POP02-HE-0001 Revision 2, "Electrical Auxiliary Building HVAC System."

   Step 9.0 of Procedure 2POP02-HE-0001 requires returning the Electrical Auxiliary Building/Control Room to a normal operating configuration after an actuation.

   Contrary to the above, Procedure 2POP02-HE-0001 was determined to be inappropriate to the circumstances. As a result, on June 3, 1992, reactor operators performing a system restoration of the control room envelope following a system actuation did not properly perform the restoration because an outside air makeup supply flow control damper, FCV-9585, was not listed in Procedure 2POP02-HE-0001. Damper FCV-9585 remained open at the time that a surveillance procedure was signed off as having been satisfactorily completed even though the damper was required to be in the closed position.

   This is a Severity Level IV violation. (Supplement I) (499/9224-02)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The root cause of the failure to properly restore the Control Room Envelope (CRE) ventilation system following performance of the Control Room Radiation Monitor Operability Test was due to a deficient restoration procedure. The procedure did not include a step to verify that the makeup supply flow control damper, FCV-9585 was fully closed to ensure that the CRE ventilation system was restored to its normal configuration. All automatic system dampers were included in the restoration procedure except FCV-9585 and the corresponding dampers in the other 2 trains. The licensed operator signed off on the surveillance that the CRE ventilation system restoration was satisfactory because FCV-9585 had operated as required during the performance of the surveillance test and all conditions that were addressed in the restoration procedure were verified to exist. The system's configuration after the restoration was operable until subsequent cycling of the damper caused an actuator failure.

IV: Corrective Actions:

The following actions have been taken to prevent recurrence:

1. The Electrical Auxiliary Building (EAB) HVAC System lineup procedure which includes guidance on the restoration of CRE ventilation system has been revised to include the makeup supply flow control dampers for trains A, B, and C.

2. The EAB and Fuel Handling Building HVAC System lineup procedures have been reviewed to ensure that automatic flow control dampers are verified to be restored to normal configuration following a ventilation system actuation. No other problems were identified.

V. Date of Full Compliance

HL&P is in full compliance at this time.