

The Light company

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

November 13, 1992

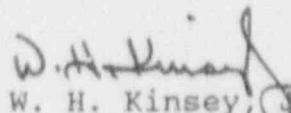
ST-HL-AE-4250
File No.: G02.04
10CFR2.201

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 9226-03
Regarding Failure to Perform Post Maintenance
Test on Essential Chiller 21C Breaker

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9226-03 dated October 16, 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) 972-7921.


W. H. Kinsey, Jr.
Vice President
Nuclear Generation

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Attachment: Reply to Notice of Violation 9226-03

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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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Revised 10/11/91

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)

Houston Lighting & Power)
Company, et al.,)

Docket Nos. 50-499

South Texas Project)
Unit 2)

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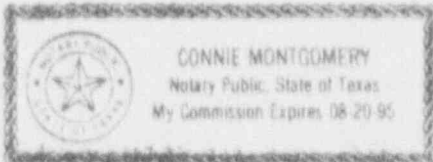
W. H. Kinsey, Jr., being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached reply to NRC Notice of Violation 9226-03; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.

W. H. Kinsey, Jr.

W. H. Kinsey, Jr.
Vice President, Nuclear Generation

STATE OF TEXAS)
)
)

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 13 day of November, 1992.



Connie Montgomery

Notary Public in and for the
State of Texas

I. Statement of Violation:

Failure to Perform an Adequate Post Maintenance Test

Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of RG 1.33, Revision 2, February 1978. Paragraph 9.a of Appendix A requires that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances. This is accomplished, in part, by Procedure OPGP03-ZE-0020, Revision 3, "Post Maintenance Testing Program."

Step 4.3.1 of Procedure OPGP03-ZE-0020 states that "post maintenance tests for quality related and technical specification related components shall verify that the component is operable as defined by applicable design documents and the Technical Specifications."

Contrary to the above, on August 12, 1992, Essential Chiller 21C was returned to service following completion of Service Request 115415, but the post maintenance test specified in the service request was not performed prior to returning the essential chiller to an operable status. Essential Chiller 21C failed to start upon demand later that day.

This is a Severity level IV violation. (Supplement I)
(499/9226-03)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The work package (115415) was written to inspect a number of Westinghouse 480 Volt breakers to be performed in conjunction with other related work packages including the essential chiller breaker. The package for the essential chiller breaker was worked separately; consequently, work package 115415 was not properly reviewed to ensure that the required PMT would be performed on the individual chiller breaker when the package was worked by itself. A contributing cause was that plant operators declared the Essential Cooling Water System train operable prior to running the essential chiller, in violation of Operations Policy 0-0054 "Electrical Breaker Continuity Checks" which requires that breakers be closed under load to demonstrate electrical continuity.

IV: Corrective Actions:

The following actions are being taken to prevent recurrence:

1. Individual Service Requests (SRs) will be issued to perform inspection and PMT of the remaining breakers referenced in SR 115415. Work implementation is scheduled to be completed during the next Unit 2 refueling outage.
2. A memorandum was issued to Operations personnel emphasizing the requirements of Operations Policy 0-0054 "Electrical Breaker Continuity Checks".
3. The Maintenance Planner's Guide has been revised to discuss the handling of multiple component work packages or work packages which are cross-referenced to ensure that the required PMT is performed on the individual components.
4. Training will be provided in the next licensed operator requalification training to reinforce the lessons learned from this event. Training will be completed by March 1, 1993.

V. Date of Full Compliance:

HL&P is in full compliance at this time.