

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-4251

File No.: G02.04

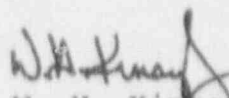
10CFR2.201

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 9226-04
Regarding Failure to Document
Completion of Work Performance

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9226-04 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

RAD/ag

Attachment: Reply to Notice of Violation 9226-04

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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

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Docket Nos. 50-498

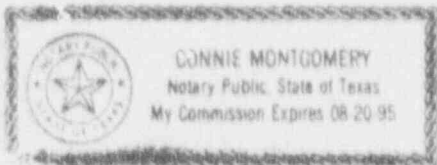
AFFIDAVIT

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 9226-04; 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.
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.



Notary Public in and for the
State of Texas

I. Statement of Violation:

Failure to Adequately Document Work Completion

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 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-ZA-0010, Revision 15, "Plant Procedure Adherence and Implementation and Independent Verification."

Step 4.2.19 of Procedure OPGP03-ZA-0010 states that, "Procedure steps with signoff blanks SHALL be signed or initialed, as appropriate, as soon as practical after the action has been performed."

Contrary to the above, on September 7, 1992, Steps 3.02, 3.03, 3.04, and 3.05 of Service Request RC-173817, were not signed off after the action had been performed by the work performer even though the work verifier had signed off on the corresponding signoff blanks.

This is a Severity level IV violation. (Supplement I)
(498/9226-04)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violation occurred.

III. Reason for Violation:

The cause of this event was that the technician did not fully understand management expectations regarding the need to signoff work performance as soon as practical after the action was performed.

IV. Corrective Actions:

The following actions are being taken:

1. A plant bulletin was issued reiterating the requirements to signoff, check or initial work performance as soon as practical after a procedure action is performed.

IV. Corrective Actions: (Con't)

2. Operations, Maintenance, Plant Engineering and Technical Services Management will provide a briefing paper to their first line supervisors regarding the need to signoff, check or initial work performance as soon as practical after the action is performed. The briefing papers will include examples where it is impractical to signoff, check or initial work performance immediately after the action is performed. This action will be completed by December 4, 1992.
3. First line supervisors in Operations, Maintenance, Plant Engineering and Technical Services will discuss management's expectations with their personnel regarding the need to signoff, check or initial work performance as soon as practical after the action is performed. This action will be completed by December 18, 1992.
4. Management's expectations will be incorporated into training lesson plans for Work Control which is provided to Maintenance personnel, including new employees and contractors. Management's expectations will be incorporated into lesson plans for Administrative Procedures which is provided to licensed and non-licensed operators, including new personnel. These actions will be completed by December 31, 1992.

V. Date of Full Compliance:

HL&P is in full compliance at this time. Briefings will be conducted by December 18, 1992 to ensure that plant personnel understand management's expectations.