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-4254
File No.: G02.04
10CFR2.201

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

South Texas Project
Unit 1 & 2
Docket Nos. STN 50-498, STN 50-499
Reply to Notice of Violation 9226-02
Regarding Failure to Maintain Adequate Procedures

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9226-02 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 9226-02

17 108

IR\92-307.002

IE01

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/

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter	)	
	)	
Houston Lighting & Power	)	Docket Nos. 50-498
Company, et al.,	)	50-499
	)	
South Texas Project	)	
Unit 1 and 2	)	

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 the NRC Notice of Violation 9226-02; 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 13th day of November, 1992.

MINNIE GONZALES
Notary Public, State of Texas
My Commission Expires 12-06-93

Minnie Gonzales
Notary Public in and for the
State of Texas

I. Statement of Violation:

Failure to Have Procedures Appropriate to the Circumstances

Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. 10 CFR 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. Three examples of violating this requirement are stated below:

1. RG 1.33, Appendix A, Item 8.b(d), recommends specific procedures for surveillance testing of containment heat and radioactivity removal systems. This is accomplished, in part, by Surveillance Procedures 1- and 2PSP03-HC-0001, Revision 2, "Reactor Containment Fan Cooler Operability."

   Contrary to the above, these procedures were inappropriate to the circumstances because they did not provide appropriate guidance to prevent an inadvertent ESF actuation. Consequently, on August 8 1992, while implementing Procedure 1PSP03-HC-0001, an inadvertent automatic start of a Unit 1 component cooling water pump occurred during the implementation of this procedure.

2. RG 1.33, Appendix A, Item 8.b(1), recommends specific tests and calibrations of the reactor protection system. This is accomplished, in part, by Procedures (1 and 2) PSP06-RC-0005, "Undervoltage Reactor Coolant Pump Trip Actuating Device Operational Test," and (1 and 2) PSP06-RC-0006, "Underfrequency Reactor Coolant Pump Trip Actuating Device Operational Test."

   Contrary to the above, these procedures were inappropriate to the circumstances because they did not provide guidance for verifying the operability of the bistable monitoring lights for the undervoltage and underfrequency relays. Consequently, on August 26, 1992, the licensee discovered that they had not been complying with TS Surveillance Requirement 4.3.1.1, Table 4.3-1, Functional Units 15 and 16 since April 1990.

I. Statement of Violation: (Con't)

3. RG 1.33, Appendix A, Item 3.s(3), recommends procedures for direct current emergency power sources. This is accomplished, in part, by Procedure 1POP02-EE-0001, "ESF Class 1E DC Distribution System."

Contrary to the above, Procedure 1POP02-EE-0001 was determined to be inappropriate to the circumstances because Step 7.1.8.2 provided instructions to ensure that battery charger voltage is maintained between 125 and 135 volts direct current. The TS minimum terminal voltage for a battery on a float charge is 129 volts direct current. On September 11, 1992, the terminal voltage for Battery E1B11 was less than 129 volts direct current while the battery was on a float charge.

This is a Severity Level IV violation. (Supplement I) (498;499/9226-02)

II. Houston Lighting & Power Position:

HL&P concurs that the cited violations occurred.

III. Reason for Violation:

1. The cause of the inadvertent component cooling water pump start was inadequate procedural guidance. The procedure (1PSP03-HC-0001) stated only to establish flow and did not identify possible actuations or prevention for those actuations.

2. The bistable status monitoring lights were not verified to be operable during the performance of the Reactor Coolant Pump (RCP) Undervoltage and Underfrequency Trip Actuating Device Operability Test (TADOT) procedures because Field Changes (FCs) to the procedures were initiated in April 1990, to remove the requirement from the procedure acceptance criteria. The writers and authorities who approved the FCs did not identify the need to verify that the lights were operable as required by Technical Specification 4.3.1.1. This was due to an inadequate understanding of the definition of a TADOT by the individuals involved. A contributing factor was that procedure 0PGP03-ZA-0002 "Plant Procedures" which controls the use of FCs allowed the acceptance criteria to be changed without providing acceptable guidance to the procedure writers and authorities.

III. Reason for Violation: (Con't)

3. Following successful completion of the E1B11 Battery Charger 8 hour load verification (1PSP06-DJ-0006) required by Technical Specification 4.8.2.1.c.4, the battery charger was returned to service by Operations personnel using procedure 1POP02-EE-0001 "ESF Class 1E DC Distribution System". Procedure 1POP02-EE-0001 incorrectly specified that battery charger voltage should be verified to be greater than 125 VDC. In addition, 1PSP06-DJ-0006 did not have provisions to ensure that the as left battery charger voltage was greater than 129 VDC. A contributing cause was that the low voltage alarm was set at 117 VDC, well below Technical Specification limits.

IV. Corrective Actions:

The following actions are being taken:

1a. 1(2)PSP03-HC-0001 was revised to require the operator to place the pump mode selector switches for all trains in off during the surveillance to ensure no inadvertent pump starts occur. A caution was also added concerning Reactor Containment Fan Cooler load requirements. Additional procedures were identified and revised to incorporate the mandatory mode selector switch settings.

1b. This event and recent similar events will be covered in Licensed Operator Requalification training. Training will be completed by March 26, 1993.

2a. The TADOT procedures were revised to verify operability of bistable status monitoring lights in the acceptance criteria.

2b. A clear definition of TADOT has been formally documented and training on this definition has been provided to appropriate plant personnel.

2c. OPGP03-ZA-0002 "Plant Procedures" will be revised to control the use of FCs for changing acceptance criteria by November 30, 1992.

IV. Corrective Actions: (Con't)

2d. HL&P discovered the procedural inadequacies of the TADOT procedures during an indepth review of procedures that implement the surveillance requirements of Technical Specification Tables 4.3-1 (Reactor Protection System) and 4.3-2 (Engineered Safety Feature Actuation System). This review was performed as a result of corrective actions for Licensee Event Report 92-004 (Unit 1). The review was completed by the Surveillance Review Task Force on October 30, 1992.

3a. 1(2)POP02-EE-0001 has been revised to specify that battery charger voltage is verified to be greater than or equal to the Technical Specification minimum value of 129 VDC.

3b. 1(2)PSP06-DJ-0006 will be revised to ensure that the as left battery charger voltage is greater than 129 VDC following completion of the surveillance test. This will be completed by December 31, 1992, prior to performance of the surveillance on the Unit 2 battery chargers.

3c. The alarm setpoint will be revised to indicate that battery bus voltage is below the Technical Specification minimum value. This will be completed by March 31, 1993, in both Units.

HL&P will perform an evaluation of surveillance procedure quality by January 22, 1993, to determine whether a surveillance procedure upgrade is necessary to improve station performance in this area.

Operations Surveillance Procedures (PSP03 series) have been reviewed to ensure that safety related equipment manipulations are properly controlled in order to reduce unplanned ESF actuations. In addition, System Operating Procedures (POP02 series) are currently being reviewed to ensure that the procedures contain sufficient guidance to properly perform the subject tasks. The review of POP02 procedures is scheduled to be completed by December 31, 1993, as part of the Operations Procedure enhancement program. As an interim measure, operations personnel complete a procedure review and feedback form whenever any operations procedure is performed to ensure that the procedures provide necessary guidance. This will continue until Operations Management is satisfied that procedure weaknesses have been identified. Any significant problems identified are promptly corrected.

V. Date of Full Compliance:

HL&P is in full compliance at this time.