

The Light company

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

August 29, 1996
ST-HL-AE-5451
File No.: G02.04.02
10CFR2.201

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

South Texas Project
Unit 1
Docket No. STN 50-498
Replies to Notices of Violation 96004-01 and -04

South Texas Project has reviewed Notices of Violation 96004-01 and 96004-04, dated July 30, 1996, and submits the attached replies. It should be noted that information pertaining to the first violation was submitted to the NRC as Unit 1 Licensee Event Report 96-003, dated July 17, 1996. The events described in the Notices of Violation did not have an adverse effect on the health and safety of the public.

If there are any questions regarding these replies, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7800.



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Plant Manager,
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DBS/dbs

- Attachments: 1. Reply to Notice of Violation 96004-01
2. Reply to Notice of Violation 96004-04

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

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South Texas Project Electric Generating Station

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Reply to Notice of Violation 96004-01

I. Statement of Violation:

Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained concerning 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 should be written covering surveillance tests. This requirement is implemented, in part, via the following licensee procedure:

The South Texas Project Electric Generating Station Plant Surveillance Procedure OPSP03-XC-0002, Revision 9, "Containment Inspection," was established to implement Technical Specification 4.5.2.c.2. This specification requires that plant personnel verify the operability of the containment emergency core cooling system sump.

By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of pump suctions during LOCA conditions.

This visual inspection is required in the areas affected within containment at the completion of each containment entry when containment integrity is established.

Contrary to the above, the licensee failed to maintain Procedure OPSP03-XC-0002, because on May 15, 1996, a visual inspection of areas affected by a containment entry was conducted in accordance with the procedure and failed to verify that no loose debris was present in containment, in that, plastic bags covering equipment staged during the entry were present in containment, could have been transported to the containment sump, and could have caused restriction of pump suctions. This condition existed from 3:50 p.m. on May 15, 1996, until the material was removed and a containment reinspection was completed at 5:13 a.m. on May 16, 1996.

This is a Level IV violation (Supplement I) (498/96004-01).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The event is described in detail, including the causes, in Unit 1 Licensee Event Report 96-003, dated July 17, 1996.

IV. Corrective Actions:

The corrective actions are outlined in Unit 1 Licensee Event Report 96-003, dated July 17, 1996.

V. Date of Full Compliance:

South Texas Project is in full compliance.

Reply to Notice of Violation 96004-04

I. Statement of Violation:

Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained concerning 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 should be written covering general plant operations involving preparation for refueling. This requirement is implemented, in part, via the following licensee procedure:

The South Texas Project Electric Generating Station Plant Operating Procedure OPOP03-ZG-0009, Revision 12, "Mid-Loop Operation," Step 4.37, requires that the two narrow range hot leg water level instruments, including associated remote indications, sightglasses and alarms be available during reactor coolant system drain down to the midloop level.

Contrary to the above, on May 21, 1996, plant personnel failed to implement Procedure OPOP03-ZG-0009, in that, the two narrow range hot leg water level instruments, Level Transmitters LT-3660 and LT-3661, were isolated and unavailable during the reactor coolant system drain down to the midloop.

This is a Level IV violation (Supplement I) (498/96004-04).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The reason for the violation was inadequate procedural guidance.

The narrow range hot leg level transmitters were calibrated on May 20, 1996, in preparation for mid-loop activities. The preventative maintenance document that was used for the calibration contains the following with regards to restoration of the transmitter:

Coordinate with Operations for the restoration of transmitter to service. A joint conclusion should be reached as to whether transmitter should be placed in service or valved out until mid-loop is reached, depending on plant condition.

Due to the fact that the Reactor Coolant System was still pressurized, it was decided to maintain the narrow range hot leg level transmitters isolated. It was anticipated at this time that the instruments would be unisolated just prior to draindown to mid-loop.

Station procedure OPOP03-ZG-0009 contains the following note in the "Notes and Precautions" section:

The two narrow range hot leg (Loops 1 and 3) water level instruments including associated remote indications, sightglasses and alarms shall be available for draindown to Mid-Loop level.

However, there was no procedure step directing the transmitters be placed in service.

IV. Corrective Actions:

OPOP03-ZG-0009 was revised to include an action step requiring I&C to place the narrow range hot leg level instruments in service.

An evaluation of the interface between Operations and I&C regarding configuration control of instrumentation was conducted to ensure there are no associated generic issues. This evaluation revealed no other similar occurrences. Hence, this event is considered an isolated case.

V. Date of Full Compliance:

South Texas Project is in full compliance.

VI. Additional Information

During the time that draindown to mid-loop was in progress, redundant indications of Reactor Coolant System inventory were available. These included the two trains of Reactor Vessel Water Level indication, the Reactor Coolant System level sightglass, and the loops 1 and 3 Reactor Coolant System level gauges. Throughout the draindown process, personnel were stationed in the Reactor Containment Building, in direct communication with the control room, to monitor the Reactor Coolant System level sightglass, and the loops 1 and 3 Reactor Coolant System level gauges. Frequent comparisons were made between available water level instruments to ensure that water level indications were consistent.

Other indirect indications of Reactor Coolant System level were also available. These included Residual Heat Removal pump discharge pressure, pump flow, and pump amperage. Additionally, an extra Reactor Operator, with no other concurrent duties, was stationed at the Residual Heat Removal System controls in the control room.