745

The Light company Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

April 25, 1985
ST-HL-AE-1238
File No.: G2.4, M22.3, Q17.1.1, P11.1

Mr. Robert D. Martin
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76001

Dear Sir:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499 OL
Response to Notice of Deviation 8416-01

Pursuant to the provisions of 10 CFR 2.201, attached is Houston Lighting & Power Company's (HL&P's) response to the Notice of Deviation 50-498/8416-01, 50-499/8416-01 dated March 22, 1985. In response to a telephone request on April 22, 1985, Mr. Eric Johnson (NRC Region IV) verbally granted an extension in the time for submitting this response till April 26, 1985.

If you should have any questions regarding this matter, please contact Mr. Michael E. Powell at (713) 993-1328.

Very truly yours,

J. H. Goldberg
Group Vice President, Nuclear

JHG/FAW/rka

Attachment: Response to Notice of Violation (8416-01)

W2/NRC2/z

cc:

Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

N. Prasad Kadambi, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Claude E. Johnson
Senior Resident Inspector/STP
c/o U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

Dan Carpenter
Resident Inspector/South Texas Project
c/o U.S. Nuclear Regulatory Commission
P. O. Box 2010
Bay City, TX 77414

M. D. Schwarz, Jr., Esquire
Baker & Botts
One Shell Plaza
Houston, TX 77002

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street N.W.
Washington, DC 20036

Director, Office of Inspection
and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

E. R. Brooks/R. L. Range
Central Power & Light Company
P. O. Box 2121
Corpus Christi, TX 78403

H. L. Peterson/G. Pokorny
City of Austin
P. O. Box 1088
Austin, TX 78767

J. B. Poston/A. vonRosenberg
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Brian E. Berwick, Esquire
Assistant Attorney General for
the State of Texas
P. O. Box 12548, Capitol Station
Austin, TX 78711

Lanny A. Sinkin
3022 Porter Street, N.W. #304
Washington, D.C. 20008

Oreste R. Pirfo, Esquire
Hearing Attorney
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Charles Bechhoefer, Esquire
Chairman, Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. James C. Lamb, III
313 Woodhaven Road
Chapel Hill, NC 27514

Judge Ernest E. Hill
Hill Associates
210 Montego Drive
Danville, CA 94526

Mr. Ray Goldstein, Esquire
1001 Vaughn Building
807 Brazos
Austin, TX 78701

Citizens for Equitable Utilities, Inc.
c/o Ms. Peggy Buchorn
Route 1, Box 1684
Brazoria, TX 77422

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Response to Notice of Deviation
50-498/8416-01
50-499/8416-01

I. Statement of Deviation

Based on the results of an NRC inspection conducted during the period of November 1-December 31, 1984, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following deviation was identified with Amendment 39 of the FSAR, dated June 27, 1984.

1. Section 9.2.2.2.1, page 9.2-12 states that there should be venting of trapped gases in the CCW surge tank.

   Contrary to the above, the trapped gases must be vented from the surge tank through the surge tank relief valve.

2. Section 9.2.2.3.2, page 9.2-15 states that should a large high radiation inleakage into the CCW system develop, the level in the surge tank will rise, and the high-high-level condition will be annunciated and the atmospheric vent on the tank closed.

   Contrary to the above, no atmospheric vent is provided on the surge tank.

3. Section 9.2.2.3.2, page 9.2-15 states that if the surge tank pressure increases to the valve set pressure, the relief valve on the CCW surge tank will lift and discharge to the floor drain tank.

   Contrary to the above, the discharge will be to the CCW sump.

4. Section 9.2.2.3.2, page 9.2-15 states that inside containment the relief valves discharge to the containment normal sump.

   Contrary to the above, they discharge back to the CCW system downstream of the component isolation valve.

5. Table 9.2.2.1 states that the chemical addition tank has a volume of 250 gallons.

   Contrary to the above, it appears that the tank capacity is 50 gallons.

6. Table 9.2.2.3 on "Failure Modes and Effects Analysis" states in the RHR heat exchanger section, that the atmospheric vent on surge tank will close to prevent releases of radioactivity.

   Contrary to the above, no atmospheric vent is provided on the tank.

7. Section 11.5.2.9.12 states that "Upon initiation of a high or rate of change alarm, the monitor initiates closure of the component cooling water surge tank vent valve, FV-4500.

   Contrary to the above, no vent valve is provided on the surge tank.

II. Reply

This item was identified by Mr. D. R. Carpenter (USNRC) during the inspection period of November 1-December 31, 1984.

The present text in FSAR Section 9.2.2 (Amendment 39) reflects the original chromate inhibitor design of the Component Cooling Water (CCW) system. Replacement of this design with All-Volatile Treatment (AVT) has been under review since mid-1983. The design change to AVT in the CCW system was identified on the P&ID and placed on "HOLD" in July 1983. The "HOLD" was subsequently removed with the completion of the project review and approval on June 5, 1984 (Rev.2, DCN 5). At this time, the responsible engineer should have commenced a FSAR text revision, by initiating a Safety Analysis Report Change Request (SARCR). In November, the NRC inspectors identified several inconsistencies between the FSAR text and the issued P&ID's and brought them to the attention of HL&P (1/2/85). Upon notice from HL&P, Bechtel, (BEC) began a review of the FSAR text and the current revision of the P&ID to resolve the inconsistencies.

This deviation occurred due to failure to follow established project procedures.

In this particular incident, the change resulted from removing a "HOLD" on the P&ID. Upon issuance of the revised P&ID, the responsible engineer should have initiated the SARCR to conform the FSAR to the design change.

In early 1984 a Licensing Commitment Tracking System action item was assigned which specifically requires the affected FSAR section (9.2.2) to be reviewed relative to the AVT design change. However, this activity was not scheduled to take place until March 1985.

III. Corrective Steps Taken or To Be Taken

The deviations between the FSAR Section 9.2.2 and the current design as depicted on the P&ID will be corrected by an amendment to the FSAR. BEC SARCR 522 was initiated to correct the FSAR on January 24, 1985. The deviation involving the Failure Modes and Effects Analysis (FMEA) Table has been resolved, and an updated CCW FMEA was initiated under BEC SARCR 495 on November 5, 1984. The FSAR will be amended to correct the identified inconsistencies in a forthcoming amendment.

IV. Corrective Action Which Will Be Taken to Avoid Further Deviations

The following Bechtel Engineering Department Procedures (EDP) provide the means for identification and control of initiating SARCR's that are required based on design changes:

EDP 4.72 Configuration Control Procedures

EDP 4.73 Design Change Approval Request

EDP 4.46 Project Drawings

EDP 4.1 Design Criteria

EDP 4.23 Control of FSAR Change Requests

As a supplement to these procedures, other programs are in place to assure the consistency of the FSAR with the design. These programs include the Engineering Design Verification Program (EDP 4.27) and the Independent Design Review Program (GPR 2.25). These ongoing programs provide additional assurance that any inconsistancies between the project design and the FSAR are identified and corrected in a timely manner.

Training will be performed to further emphasize the procedural requirement to update project licensing documents upon approval of design changes. Emphasis will be given to situations where a release of a hold could effect the FSAR. This training will be completed by May 24, 1985.

In addition, a review of a representative sample of those FSAR sections describing systems where design changes were reflected by "HOLD"s on P&ID's will be completed by May 31, 1985. This review will assure that the design status is correctly reflected in the FSAR.

V. Date When Full Compliance Will Be Achieved

HL&P is now in full compliance. It is HL&P's position that the FSAR and project design disclosure documents are in conformance when the need to change the FSAR is formally identified by issuance of a HL&P FSAR Change Notice. The Bechtel SARCR's 522 and 495 were issued as HL&P FSAR Change Notices 483 and 474 on April 23, 1985 and April 16, 1985 respectively.