

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

February 8, 1993
ST-HL-AE-4307
File No.: G02.04
10CFR2.201

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Revised Response to Notice of Violation (498/8916-02; 499/8916-02)

Reference: Correspondence from S. L. Rosen (HL&P) to NRC Document
Control Desk, dated July 24, 1989 (ST-HL-AE-3172)

Houston Lighting & Power Company (HL&P) submits the attached revised response to Notice of Violation (498/8916-02; 499/8916-02) dated June 22, 1989. The original response is referenced above, and was submitted pursuant to 10CFR2.201. That response stated that accountability for accuracy of procurement documents would be further ensured by a separate verification of checklist criteria by the next higher level of authority. This revision deletes that level of review, and updates the status of the corrective actions.

Deletion of the higher level of review is acceptable because of changes made in other procurement processes. The description and requirements of the item(s) being procured are entered into a computer mainframe purchasing system, printed, reviewed and approved by Engineering and Quality Assurance, and then provided to Nuclear Purchasing to develop the purchase order. This process assures exact duplication of the approved document. The amount of time needed to process a procurement document is averaging much less than in 1989. This reduces the possibility that the technical information on a requisition would differ from the technical information printed on the issued purchase order. Procurement levels for every part at the South Texas Project are now part-number-specific, allowing the procurement level on the requisition to be duplicated automatically on the resulting purchase order. This ensures that a purchase order is not issued with a procurement level that differs from the procurement level noted on the requisition.

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A Subsidiary of Houston Industries Incorporated

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To assure the continued integrity of the procurement process, HL&P will perform annual audits/assessments of the safety-related, quality-related, and commercial-grade procurement documents as a means of verifying the correct use of the Procurement Document Quality Checklist and the accuracy of such issued procurement documents.

If there are any questions, please contact either Mr. P. L. Walker at (512) 972-8392 or me at (512) 972-7138.


S. L. Rosen
Vice President,
Nuclear Engineering

PLW/ag

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I. Statement of Violation

Criterion IV of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services..."

Paragraph 6.1.2 of Procedure NPMMP-4.7Q, Revision 0, states, "Purchase Orders/Contracts shall be prepared to reflect the requirement of the Purchase Requisition/Requests on Purchasing Department (PR/RPD)."

Contrary to the above,

1. Purchase Order (PO) RS 9876 ordered nonsafety-related Westinghouse OT1M1C selector switches rather than safety-related selector switches required by PR 140234.
2. PO RS 10630 for ASME Section III Code, Class 2 instrumentation tees identified that 10 CFR Part 21 was not applicable, which was contrary to the stipulation of 10 CFR Part 21 applicability contained in PR 596867.
3. PO RS 8244 ordered Schedule 80, 3-inch, ASME Section III Code, Class 2, SB-165 pipe rather than the Schedule 160 pipe required by PR 141051.

II. Houston Lighting & Power Position

HL&P concurs that the cited violation occurred.

III. Reason for Violation

The cause of this violation is the failure of procurement personnel to ensure the technical and quality requirements of the purchase requisition(s) (PR/RPD) are accurately reflected in the procurement documents. This resulted due to the fact that the procurement process in effect at the time of the subject audit did not include verification of the completed procurement documentation package for compliance with the PR/RPD requirements.

IV. Corrective Action Taken and Results Achieved

The following corrective actions have been taken:

1. A Procurement Document Quality Checklist has been created for use in reviewing for consistency between POs and PR/RPDs. Personnel conducting the purchase order reviews have been trained regarding the intent of the checklist criteria and its appropriate application during the review process.
2. All previously issued safety-related, quality-related, and commercial-grade purchase orders were reviewed using a Procurement Document Quality Checklist, and any found that did not reflect the Purchase Requisition/Requisition on Purchasing Department (PR/RPD) requirements were noted and corrected.
3. Quality control inspectors or cognizant technical organizations have reviewed the receipt inspection documentation for the identified discrepant purchase orders and determined that the material received was supplied and inspected in accordance with the technical and quality requirements delineated in the PR/RPD. The material in the field covered by these purchase orders is appropriate for the application.
4. The corrective action for those discrepant orders was transmittal of the corrective supplement to the affected vendor. The vendors are requested to acknowledge that material and services provided in those purchase orders are in accordance with the technical and quality requirements of the corrective supplement.

V. Corrective Action Taken to Prevent Recurrence

A Procurement Document Quality Checklist has been developed for the purpose of ensuring that safety-related and commercial-grade procurement documents are issued in accordance with the requirements of the PR/RPD and applicable procedures. (The areas of deficiency noted by the subject audit are specifically included in the checklist.)

The procurement process now requires that procurement documents initiated since June 12, 1989, be reviewed in accordance with the checklist criteria. The buyer initiating the procurement documents is responsible for verifying the checklist criteria and confirming the verification process by signing the checklist. The completed checklist with the verification signature is then filed in the procurement document file.

Procurement personnel have been trained in regard to the intent of the checklist criteria and their appropriate application in the review of procurement documents.

As a further measure, the Nuclear Purchasing and Materials Management Procedures have been revised as appropriate to include the requirement that safety-related and commercial grade procurement documents must be reviewed and verified with a properly completed and signed Procurement Document Quality Checklist prior to issuance.

VI. Date of Full Compliance

The South Texas Project is in full compliance at this time.