

**The Light
company**

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Mr. Robert D. Martin
Regional Administrator, Region IV
Nuclear Regulatory Commission
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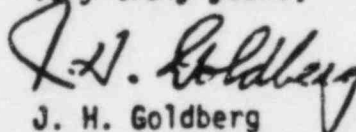
South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation
50-498/8507-01 and 8507-02
50-499/8507-01 and 8507-02

Dear Mr. Martin:

Houston Lighting & Power Company (HL&P) has reviewed the Notice of Violations 50-498/8507-01, 50-499/8507-01 and 50-498/8507-02, 50-499/8507-02 dated July 25, 1985 and submits the attached response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Ms. Frostie A. White at (512) 972-8392.

Very truly yours,



J. H. Goldberg
Group Vice President, Nuclear

JHG/FAW/kc

Attachment: Response to Notices of Violations (8507-01)
(8507-02)

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W2/NRC2/r

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South Texas Project
Response to Notice of Violation
50-498/8507-01
50-499/8507-01

I. Statement of Violation

Based on the results of an NRC inspection conducted during the period of May 13-24, 1985 and May 28-31, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violation was identified:

Failure to Properly Follow Procedure

Criterion V of Appendix B to 10 CFR Part 50 required that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings. This requirement is part of the approved QAPD (Quality Assurance Plan Description) for South Texas Project, Section 5.

Procedures PGP3-ZM-1, ASP-23 and QCP 12.1 require "recording of the identification and dates of all items inspected or tested with M&TE be recorded on the "Tool Data Issue/Record Card" - to provide traceability.

Contrary to the above, the NRC inspector observed instances when no information was recorded or improperly noted in the record section.

Procedure PGP3-ZM-1 requires test equipment returned prior to being recalled to have the calibration sticker removed and a white dot attached.

Contrary to the above, the NRC inspector observed the laboratory M&TE calibration clerk attaching a Form 5 to all items irrespective of whether the item was recalled, damaged or returned prior to recall.

Procedures ASP-23 and QCP-12.1 require M&TE be returned to the calibration laboratory prior to expiration of calibration period or if sticker indicates equipment period has expired, equipment will be immediately returned to the calibration laboratory.

Contrary to the above, M&TE ST-CC-3173 and ST-CC-3174 were not returned until 8 days and 12 days after their respective dates.

Procedure PGP3-ZM-1 required that equipment requiring calibration be listed in the calibration schedule.

II. Reply

In the four situations that are identified in the inspection report, 1) improper recording of usage on "Tool Data Issue/Record Card", 2) not attaching a white dot to returned test equipment, 3) test equipment not being returned on calibration due date and 4) test equipment not being listed in the calibration schedule occurred due to failure to follow established procedures. The investigation indicates that there has been no adverse effect on quality or hardware resulting from these failures to follow procedure.

III. Corrective Steps Taken or To Be Taken

An appropriate investigation has been performed by Bechtel and Ebasco representatives to determine the cause of the Tool Data Issue/Record Cards not being properly completed. These investigations have confirmed that the column labeled "Value" did not always contain proper information or was not completed. The Tool Data Issue/Record Card "Value" column is utilized for evaluation of test equipment found out of tolerance to limit the amount of retest required. However, the Tool Data Issue/Record Card is not the official record which identifies the results of the test or inspection being performed for acceptability. The appropriate Quality Control Inspection Reports generated in accordance with applicable procedures are the documents required to indicate test or inspection results and acceptability. The investigation indicated that failure to record values on the Tool Data Issue/Record Card have had no adverse effect on hardware.

In regard to the application of a white dot to the test equipment after the test equipment has been recalled and the calibration sticker removed, the issue clerks had requested clarification of the procedural requirements for application of the white dots when test equipment is returned to the issue area. A senior metrology laboratory technician proceeded to direct the personnel to apply the Form 5 instead of the white dot for all test equipment returned to the issue area, since the white dot and the Form 5 serve the same purpose. The purpose of the white dot and the Form 5 was to easily identify test equipment which requires calibration before it can be reissued. Previously, PGP3-ZM-01 allowed the use of the Form 5 for all M&TE equipment prior to the implementation of the white dot identification. The white dot was specifically designed for construction-oriented M&TE. The Form 5 provides the mechanism to identify additional information that could be useful if test equipment has been damaged or is suspected of being damaged. The senior metrology laboratory technician interpreted the procedural

South Texas Project
Response to Notice of Violation
50-498/8507-01
50-499/8507-01

I. Statement of Violation

Based on the results of an NRC inspection conducted during the period of May 13-24, 1985 and May 28-31, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violation was identified:

Failure to Properly Follow Procedure

Criterion V of Appendix B to 10 CFR Part 50 required that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings. This requirement is part of the approved QAPD (Quality Assurance Plan Description) for South Texas Project, Section 5.

Procedures PGP3-ZM-1, ASP-23 and QCP 12.1 require "recording of the identification and dates of all items inspected or tested with M&TE be recorded on the "Tool Data Issue/Record Card" - to provide traceability.

Contrary to the above, the NRC inspector observed instances when no information was recorded or improperly noted in the record section.

Procedure PGP3-ZM-1 requires test equipment returned prior to being recalled to have the calibration sticker removed and a white dot attached.

Contrary to the above, the NRC inspector observed the laboratory M&TE calibration clerk attaching a Form 5 to all items irrespective of whether the item was recalled, damaged or returned prior to recall.

Procedures ASP-23 and QCP-12.1 require M&TE be returned to the calibration laboratory prior to expiration of calibration period or if sticker indicates equipment period has expired, equipment will be immediately returned to the calibration laboratory.

Contrary to the above, M&TE ST-CC-3173 and ST-CC-3174 were not returned until 8 days and 12 days after their respective dates.

Procedure PGP3-ZM-1 required that equipment requiring calibration be listed in the calibration schedule.

Contrary to the above, test equipment ST-CC-3173 was not listed in the calibration schedule.

requirements to allow the use of the Form 5 instead of the white dot inasmuch as the Form 5 covers all M&TE equipment. The application of the white dot for construction-oriented M&TE was to be used in lieu of the Form 5 to expedite the calibration process for equipment that was not damaged. The immediate actions taken were to place the white dots on the test equipment as required and to conduct retraining of the personnel to ensure adherence to procedural requirements. The personnel training was completed May 30, 1985. Subsequently, procedure PGP3-ZM-01 was revised to clarify the use of the Form 5 and to delete the requirements for the white dot. The procedure revision was effective June 27, 1985. Although the white dot was not placed on the returned test equipment, adequate controls were in place to ensure that no test equipment was reissued to the field without recalibration. This is considered to be an isolated case and no recurrence control is required.

Investigative actions have been performed by Bechtel and Ebasco representatives in regard to the M&TE being returned late to the calibration laboratory. The two pieces of test equipment, ST-CC-3173 and ST-CC-3174, have been returned to the metrology laboratory. The recalibration of the test equipment and investigative actions indicate that there has been no adverse effect on hardware. A review of the record of issued test equipment resulted in HL&P QA issuing SDR's H-125 and H-126 which identify eighty additional pieces of test equipment which had been recalled by procedure, but not returned by the calibration due date.

Immediate actions were taken to notify the users to return the test equipment. When test equipment is returned to the metrology laboratory, it is recalibrated to verify the test equipment is still in tolerance. If test equipment is found to be out of tolerance, an out-of calibration evaluation is performed and appropriate corrective action is taken. If test equipment is damaged and cannot be recalibrated or is lost, the test equipment is assumed to be out of tolerance and an out of calibration evaluation is also performed. Therefore, when test equipment is returned to the metrology laboratory even though it might be after its calibration due date, the validity of the data that has been taken is verified by recalibration. If equipment is found to be out of tolerance, an out-of-calibration evaluation is performed and appropriate corrective action is taken to ensure that no adverse effect on hardware has occurred.

Test equipment ST-CC-3173 was not listed in the calibration schedule because the completed calibration data sheet was inadvertently filed in the history file before the necessary information was entered into the calibration schedule program. Test equipment ST-CC-3174 was also determined not to have been entered into the calibration schedule program for the above reason. Recall notices had not been issued for either ST-CC-3173 or ST-CC-3174, since they were not statused in the calibration schedule. The actions taken were to notify the user to return ST-CC-3173 and ST-CC-3174. The user returned ST-CC-3173 and ST-CC-3174. Review of the M&TE files did not reveal any additional items that were not entered into the calibration schedule. Therefore, the inadvertent filing of the completed calibration data sheets before the calibration information was updated in the schedule is considered to be an isolated occurrence. Retraining was provided to the clerical personnel, data entry personnel, and the metrology technicians on the importance of handling of the calibration data sheets. Separate in/out routing baskets have been established to ensure that the calibration data sheets are properly handled, routed, and filed. The review action indicates that there has been no adverse effect on hardware. These actions were completed July 16, 1985. This is considered to be an isolated case and no recurrence control is required.

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

Procedure ASP-23 has been revised (on July 31, 1985) to provide enhanced details and instructions for completion of the Tool Data Issue/Record Card. Appropriate construction personnel will be instructed to the above revision and construction personnel will be reinstructed to strictly adhere to the procedural requirements. Quality Control supervisors have been reinstructed on the proper completion of the Tool Data Issue/Record Card and on the late return of test equipment. In addition, the Quality Control Supervisors will be required to assure that these requirements are understood by all inspectors.

V. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 6, 1985.

South Texas Project
Response to Notice of Violation
50-498/8507-02
50-499/8507-02

I. Statement of Violation

Based on the results of an NRC inspection conducted during the period of May 13-24, 1985 and May 28-31, 1985, and in accordance with the NRC Enforcement Policy (10CFR Part 2, Appendix C), the following violation was identified:

Failure to Have Approved Procedures

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings. This requirement is part of the approved QAPD (Quality Assurance Plan Description) of South Texas Project, Section 5.

Contrary to the above, the Metrology and Test Equipment Laboratory is using a "check-in/out" log and a "past due tracking log". Neither of these logs are addressed in approved procedures which explains their purpose, responsibilities or actions to be taken in the use of these logs.

II. Reply

Adequate provisions have been contained in procedures PGP3-ZM-01, ASP-23 and QCP-12.1, through the use of the Calibration Schedule, Tool Data Issue/Record Card, and the M&TE History Files, to ensure proper calibration, issuance and retrieval of M&TE equipment.

In December 1984, the HL&P and Ebasco metrology laboratory programs were consolidated into one program with HL&P having the responsibility for operation of the metrology laboratory.

The "check in/out" log that was being used by the issue clerks was a log that was used during the time that the Ebasco organization had responsibility for the metrology laboratory. This log was a carryover from the previous program and was being used by the issue clerks as a convenience.

The log had a space for users to print their name and the clerks would use the log to help determine the spelling of the user's name.

The Tool Data Issue/Record Card, which is used to check out M&TE, does contain the signature and badge number of the user and is the governing document used to control and return equipment. Should the spelling be difficult to determine, the badge number could be used to determine the individual's name by contacting the payroll personnel or the authorized user's file. This "check-in/out" log was an informal log that was used for convenience, its use or non-use did not and would not have any effect on the issuance or recall of test equipment. The use of the log has been discontinued.

The use of the "past due tracking log" had previously been identified as an enhancement to the overall metrology laboratory program. This enhancement was being used to quickly determine the status of M&TE that had been recalled, if recall notices had been issued or if M&TE had been returned, instead of researching the individual files each time the information was needed.

The information that was contained on the log was available from the calibration schedule or the files. The use or non-use of the log would not have any effect on the determination of the status of the M&TE since procedural requirements were contained in PGP3-ZM-01 that governed the recall of M&TE and the responsibilities and actions to be taken. Revisions to the procedure were being drafted to enhance the overall Measuring and Test Equipment Program which would utilize this log. The "past due tracking log" was being utilized, by verbal instructions, before the procedure was revised. PGP3-ZM-01 was revised on June 27, 1985 and training of the personnel has been completed.

III. Corrective Steps Which Have Been Taken and the Results Achieved

The "check in/out" log has been discontinued and procedure PGP3-ZM-01 has been revised to incorporate use of the recall log.

HL&P will avoid introducing verbal enhancements to programs governed by written procedures.

IV. Date When Full Compliance Will Be Achieved

HL&P is in compliance with 10CFR50, Appendix B. Criterion V and applicable site procedures.