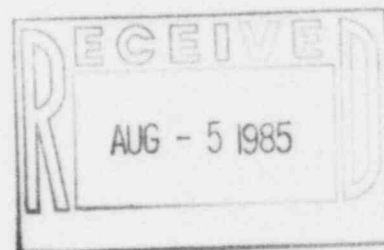


# The Light company

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

August 2, 1985  
ST-HL-AE-1313  
File No.: G12.242

Mr. Robert D. Martin  
Regional Administrator, Region IV  
Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011



South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Final Report Concerning  
Altered Certificates of Compliance

Dear Mr. Martin:

On May 24, 1985, pursuant to 10CFR50.55(e), Houston Lighting & Power Company (HL&P) notified your office of a potentially reportable item concerning altered Certificates of Compliance. Attached is the final report concerning this item. It has been determined that had the deficiency described gone uncorrected, the safety of plant operations would not have been affected.

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

Very truly yours,

*J. H. Goldberg*

J. H. Goldberg  
Group Vice President, Nuclear

CAA/yd

Attachment: Final Report Concerning  
Altered Certificates of Compliance

85-696

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cc:

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Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

South Texas Project  
Units 1 & 2  
Final Report Concerning  
Altered Certificates of Compliance

I. Summary

On May 24, 1985, Houston Lighting & Power Company (HL&P) notified Region IV of the NRC about a potentially reportable deficiency concerning altered Certificates of Compliance. Certificates for specific batches of material from NPS Industries (NPSI) were altered by removal of the Material Identification Control (MIC) number to reflect generic certification of other material. The corrective action included obtaining a written statement by the vendor that the Certificates of Compliance or Certified Material Test Reports (CMTRs) per the applicable Code Edition and Addenda are retained in their files. This deficiency would not, therefore, have adversely affected the safety of plant operations had it gone uncorrected.

II. Description of the Deficiency

Several documentation packages for pipe support clamps and related bolting materials for Safety Class 2 and 3 applications appear to have been delivered by NPSI to the jobsite with Certificates of Compliance that applied only to the clamp materials. No reference was made to the certification of the related bolting components. The clamps and the bolting were subsequently released to the field using copies of the Certificates of Compliance that were not applicable to the specific bolting items released. The Certificates were copies of other specific Certificates of Compliance with the NPSI assigned MIC number removed.

The NPSI Certificates have been investigated. Two Certificates were identified as altered by removal of the MIC number and used as certification in a total of eight packages. Although the source or individual(s) responsible could not be identified, it has been determined with reasonable assurance that the alteration took place after October 1984. These instances have been documented on Nonconformance Reports (NCRs) and a Standard Deficiency Report (SDR).

Although the extent of the alterations within the NPSI material was very limited and had no safety significance, a review was performed to determine if similar alterations existed with other suppliers. Since such a deficiency would most likely appear within a purchase order of material from a supplier of bulk commodities (supports, pipe, fittings etc.), the review included a sampling of these purchase orders. All certifications sampled were found to be unaltered and acceptable.

III. Corrective Action

A Standard Deficiency Report (SDR) was issued by Bechtel to document and control this deficiency. Investigations conducted as a result of this SDR concluded that the alteration of Certificates of Compliance or CMTRs was limited to the NPSI Certificates, and that all such instances have been identified. NPSI has recently stated in writing that they retain in their files the Certificates of Compliance or CMTRs for all of their safety-related shipments.

IV. Recurrence Control

Bechtel and Ebasco quality control personnel who are involved with receiving material, material control and document management have been trained in the generic impact of this deficiency. Material certificates typical of those referenced in this report will not be used as acceptable documentation. This policy is being enforced in the training.

V. Safety Analysis

Materials affected by this deficiency are installed in the pipe supports in various safety-related systems. However, there is applicable documentation that the material supplied by NPSI is adequate and certified. Therefore, no safety hazard exists.