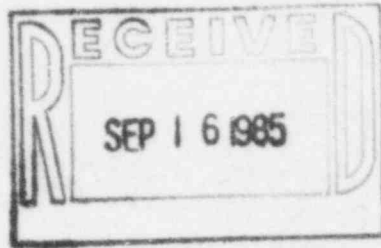


# The Light company

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



September 13, 1985

ST-HL-AE-1363

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, Texas 76011

South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Response to Notice of Violation 8506-01

Dear Mr. Martin:

Houston Lighting and Power Company (HL&P) has reviewed Notice of Violation 50-498/8506-01, 50-499/8506-01 dated August 16, 1985 and submits the attached response pursuant to 10CFR2.201.

If you should have any questions regarding this matter, please contact Ms. F. A. White at 512-972-8392.

Very truly yours,

*J. H. Goldberg*  
J. H. Goldberg  
Group Vice President, Nuclear

JHG/FAW/jlk

Attachment: Response to Notice of Violation (8506-01)

8510220360 851016  
PDR ADDCK 05000498  
G PDR

IC-141/85

W2/NRC2/o

cc:

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c/o Ms. Peggy Buchorn  
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Brazoria, TX 77422

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

South Texas Project  
Units 1 & 2  
50-198/8506-01  
50-499/8506-01

I. Statement of Violation

During an NRC Inspection conducted April 15 through May 24, 1985, a violation of NRC requirements was identified. The violation as described in NRC Inspection Report 50-498/8506-01, 50-499/8506-01 is provided below:

"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) for South Texas Project.

Procedure CSP-6, Rev. 2, dated March 7, 1985, requires that hangers be constructed in accordance with installation documents and to present hangers in acceptable condition prior to quality control inspector's review and that the HVAC craft supervisor assures conformance to the installation documents, and assure inspections are performed.

Contrary to the above, the NRC inspector visually inspected Support 1-5-0036-S022. The records indicate that the bolts were torqued. Visual inspection indicated that these bolts were loose.

This is a Severity Level IV violation (10 CFR Part 2 Supplement II) (50/499-8506-01)."

II. Reply

The subject support (1-5-00360S0022) is a nonsafety-related Class 7 (II/I) component which does not require inspection by Quality Control (QC). Field engineering had previously accepted and recorded it with the bolts properly torqued but it was later found by the NRC inspector to have loose bolts. The reason for this condition is believed to be unauthorized work by craft personnel after final inspection. As a result of this Notice of Violation, Ebasco and Bechtel QA performed additional surveillances on Class 7 installations. No deficiencies were identified.

Investigations also revealed that the Ebasco procedure does not address or document "modification or removal" of Class 7 installations that have been previously inspected and accepted by field engineering.

### III. Corrective Actions Taken or to be Taken

As provided in the requirements of ASP-16, Deficiency Report (DR) M-0576 was issued to track the resolution of the condition. Retorquing of the bolts has been performed.

### IV. Steps Taken or To Be Taken to Avoid Further Violations

Applicable Ebasco procedures for Class 7 installations will be revised to include requirements to control the modifications and/or removal of items that have been inspected and accepted by inspection personnel. Appropriate personnel will be reinstructed in the requirements of these procedures once they are revised. This is scheduled for completion by October 15, 1985.

Although surveillances performed by Bechtel and Ebasco indicate that the condition cited was an isolated occurrence in Class 7 installations, there had, however, been instances of "unauthorized work" in safety-related applications that were documented in project deficiency reports prior to this Notice of Violation. As a result, a reinstruction of Ebasco construction personnel had already been implemented by means of the "Quality Talk" program. The following points were emphasized to craft personnel during this reinstruction:

- o When items have been inspected no modifications or removal may be made without first notifying QC. Safety-related items that have been made at the Ebasco On-site Fabrication Shop and QC inspected before release are considered to be final inspected. Items bought from other manufacturers are also considered to be final inspected.
- o QC is to be notified by the use of Modification/Removal Control Form. This form must be filled out by construction personnel and signed by the appropriate QC supervisor before any modification or removal may take place.
- c Typical examples of work that requires use of the Modification/Removal Control Form, cited during the reinstruction, include removal of a vendor or shop weld, removal and relocation of Nelson studs, taking apart bolted connections or removing a nut etc., and complete removal of an installed and inspected item.

Ebasco Construction also issued a memo to craft personnel which re-emphasized the policy that all STP work is performed by procedure with written authorizations, and that all items or components which are installed, inspected and and accepted, are not to be removed or altered without written authorization. It also directs craft to contact supervision for questions about their work.

V. Date When Full Compliance Will Be Achieved

October 15, 1985