

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

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

South Texas Project
Units 1 and 2
Docket Nos. 50-498; 50-499
Change in Commitment for Reply to Notice of Violation 9226-02

Reference: Letter from W. H. Kinsey, Jr. to the Nuclear Regulatory Commission
Document Control Desk dated October 13, 1992. (ST-HL-AE-4254)

The South Texas Project submits the following attachment to inform the Nuclear Regulatory Commission of a change to a commitment made in response to Notice of Violation 9226-02 concerning a failure to maintain adequate procedures.

If you have any questions regarding this subject, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7902.


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Attachment

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Background:

Notice of Violation 9226-02 identified South Texas Project's failure to comply with the following obligations: "Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering those activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings", requires, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances.

In the reply to Notice of Violation 9226-02, the South Texas Project determined that a contributing cause to the event was that the undervoltage alarm for the Class 1E 125 VDC system was set at 117 VDC, well below the Technical Specification minimum value of 129 VDC. In order to allow the alarm to be used to warn the operators of a potential violation, the following commitment was made:

The alarm setpoint will be revised to indicate that the battery bus voltage is below the Technical Specification minimum value. This will be completed by March 31, 1993, in both Units.

Although the intent of this commitment was to provide an anticipatory alarm by setting the alarm at 129 VDC or greater, our original attempt at compliance with the commitment resulted in setting the alarm at 127 VDC. The setpoint of 127 VDC was selected during the modification process to preclude nuisance alarms. The nuisance alarms would be expected since normal operating voltage is between 129 VDC to 131 VDC. As a result, the setpoint was established at 127 VDC and the commitment was closed. Subsequently, at this voltage value, nuisance alarms still occurred due to the sensitivity of the instrument and the narrow margin between the setpoint and the normal operating voltage. To remedy this, the alarm setpoints were ultimately established at 124 VDC.

The original commitment would have resulted in a misapplication of the undervoltage alarm's original design function. Additionally, we have determined that this commitment is not necessary to address the violation and are notifying the Nuclear Regulatory Commission of its deletion.

The difference between the original commitment and the actions implemented was discovered during an Engineering Self Assessment conducted in October, 1996.

Basis for Changing this Commitment:

The setting of the undervoltage alarm at 117 VDC was listed in the response to IR 9226-02 as a contributing cause of the event. However, the undervoltage alarm setting did not offer a barrier to this event, and the original setting was in accordance with the system design basis and appropriate for the undervoltage alarm's intended function. The design basis function for the undervoltage alarm is to alert the operators that a battery is being discharged. Deleting this commitment does not change the function of the alarms. Existing setpoints are satisfactory for detecting and alerting control room operators of an actual battery discharge condition and/or condition that has degraded the system's design function.

Technical Specification surveillance requirements implemented by surveillance procedures require that the battery voltage be verified in the operable range at least once per seven days. In addition, Plant Operator daily rounds include monitoring of the battery voltage.

The violation cited in the Notice of Violation was for a failure to have procedures appropriate to the circumstances. The operating procedures provided instructions to ensure that battery charger voltage was maintained between 125 and 135 VDC rather than ensure minimum float voltage of 129 VDC. The commitments listed as 3.a and 3.b, in the reply to the Notice of Violation, revised the procedure for the Engineered Safety Feature (CLASS 1E) DC Distribution System and the surveillance procedure for the Battery Charger 8 Hour Load Test. The procedures were revised to provide instructions to verify that the as left battery charger voltage is greater than or equal to the Technical Specification minimum float voltage (129 VDC). The completion of these two commitments restored compliance with the obligation as stated in the Notice of Violation.

The commitment being deleted does not provide a corrective action that will rectify the actual violation (i.e. failure to have procedures appropriate to the circumstances). Deleting the commitment will not result in a failure to comply with the requirements cited in the Notice of Violation.

Additional Information:

Corrective actions specific to the control of commitments is being addressed through our Corrective Action Program.