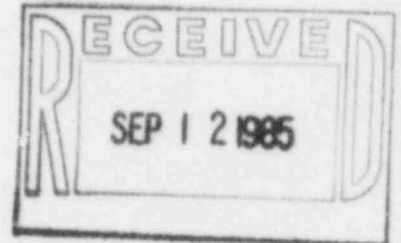


# The Light company

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

September 9, 1985  
ST-HL-AE-1352  
File No.: G12.252

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  
Second Interim Report Concerning  
Pipe Support Deficiencies

Dear Mr. Martin:

On May 30, 1985, pursuant to 10CFR50.55(e), Houston Lighting & Power Company (HL&P), notified your office of an item concerning potential deficiencies in pipe supports that have been accepted by Ebasco's Quality Control (QC). Attached is the second interim report concerning this item. The next report will be submitted to your office by January 10, 1986.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Goldberg".

J. H. Goldberg  
Group Vice President, Nuclear

MEP/as

Attachment: Second Interim Report Concerning  
Pipe Support Deficiencies

8509190375 850909  
PDR ADOCK 05000498  
S PDR

85-815

W2/NRC3/u

55-27

11

cc:

Hugh L. Thompson, Jr., Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

N. Prasad Kadambi, Project Manager  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, MD 20814

Claude E. Johnson  
Senior Resident Inspector/STP  
c/o U.S. Nuclear Regulatory Commission  
P. O. Box 910  
Bay City, TX 77414

M. D. Schwarz, Jr., Esquire  
Baker & Botts  
One Shell Plaza  
Houston, TX 77002

J. R. Newman, Esquire  
Newman & Holtzinger, P.C.  
1615 L Street N.W.  
Washington, DC 20036

Director, Office of Inspection  
and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

E. R. Brooks/R. L. Range  
Central Power & Light Company  
P. O. Box 2121  
Corpus Christi, TX 78403

H. L. Peterson/G. Pokorny  
City of Austin  
P. O. Box 1088  
Austin, TX 78767

J. B. Poston/A. vonRosenberg  
City Public Service Board  
P. O. Box 1771  
San Antonio, TX 78296

Brian E. Berwick, Esquire  
Assistant Attorney General for  
the State of Texas  
P. O. Box 12548, Capitol Station  
Austin, TX 78711

Lanny A. Sinkin  
3022 Porter Street, N.W. #304  
Washington, D.C. 20008

Oreste R. Pirfo, Esquire  
Hearing Attorney  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Charles Bechhoefer, Esquire  
Chairman, Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. James C. Lamb, III  
313 Woodhaven Road  
Chapel Hill, NC 27514

Judge Frederick J. Shon  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Ray Goldstein, Esquire  
1001 Vaughn Building  
807 Brazos  
Austin, TX 78701

Citizens for Equitable Utilities, Inc.  
c/o Ms. Peggy Buchorn  
Route 1, Box 1684  
Brazoria, TX 77422

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

South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Second Interim Report Concerning  
Pipe Support Deficiencies

I. Summary

On May 30, 1985, Houston Lighting & Power Company (HL&P) notified NRC Region IV of deficiencies that had been identified on safety-related pipe supports previously accepted by Ebasco Quality Control (QC). The extent of the deficiencies found in the sample inspections represents a breakdown in the Quality Assurance Program and is therefore reportable under 10CFR50.55(e).

II. Description of the Deficiency

HL&P QA Effectiveness Inspections (EIs) have been established to monitor the constructor's QC program and to provide timely identification and correction of problems. Under the cognizance of the ongoing EI program, a concentrated inspection was conducted on safety-related pipe supports that had been accepted by Ebasco QC. Nonconforming conditions were identified on 12 of the 16 supports inspected. These findings were documented on site Nonconformance Reports (NCRs) and a Standard Deficiency Report (SDR) and resulted in the initiation of a Deficiency Evaluation Form (DEF). In the same time frame, similar nonconforming conditions were found by HL&P's Pre-CAT Verification Team (PCVT) during their inspection of a sample of 27 safety-related pipe supports. The PCVT consists of a group of outside consultants, under the supervision of HL&P, established to provide an objective appraisal of safety-related construction.

At the time of these inspections, approximately 20% of the large bore Unit 1 safety-related pipe supports had been accepted by Ebasco Quality Control (QC). Although the majority of the nonconforming conditions are minor in nature and easily correctable (e.g., broken cotter pins, loose lock nuts, rusty load pins, etc), Ebasco QC, on May 28, 1985, stopped all final inspections pending completion of a joint investigation by HL&P/Bechtel/Ebasco.

III. Corrective Actions

All of the corrective actions set forth in the first interim report have been or are in the process of being implemented. Their status to date is described below.

The pipe support installation specification (JS1002) was revised to enhance its implementation on the site. The revision provides clarifications and simplifications that, in conjunction with the revision to the QC inspection procedure (QCP10.12), will assist installation and inspection. After these changes were made and the inspectors were trained to the revised procedure, Ebasco QC restarted final inspections of safety-related supports in mid-July.

Using the revised specification (JS1002) and procedure (QCP10.12), a reinspection program for all safety-related pipe supports, previously accepted by Ebasco QC, has been instituted in accordance with the dispositions of the NCRs (Nos. CS-00875 and CS-00885) which define the attributes considered during the reinspections. The HL&P Quality Assurance Effectiveness Inspection (EI) program is being used to monitor Ebasco's reinspection progress. A schedule for completion of the reinspection program will be addressed in the next report.

The pipe support construction and the QC inspection procedures are being consolidated into a Standard Site Procedure (SSP-9). Implementation is pending issuance or revision of several associated procedures and completion of training of construction and QC personnel. When SSP-9 is implemented, it will replace QCP10.12 and will:

- Combine construction and inspection requirements into a common procedure.
- Delineate the requirements for construction activities, inspection activities, criteria, qualification of inspection personnel and records.
- Require documented construction acceptance for each pipe support prior to QC inspection.

#### IV. Recurrence Control

Recurrence control measures will consist of the actions described in Paragraph III above. The effectiveness of these actions will be monitored through normal STP QA surveillances and the HL&P EI program.

#### V. Safety Analysis

Rather than perform an extensive analysis, HL&P has taken action to correct the deficiency.