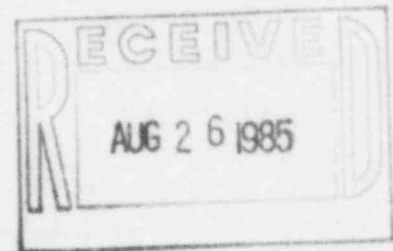


The Light company

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

August 22, 1985
ST-HL-AE-1337
File No.: G2.4, M22.3

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 8501-01

Dear Mr. Martin:

HL&P has reviewed Notice of Violation 50-498/499-8501-01 dated July 23, 1985 and submits the attached response pursuant to 10CFR2.201. During the resident inspector's exit on August 2, 1985, HL&P was informed that the subject violation will be closed in NRC Inspection Report 85-11, pending submittal of the STPEGS response.

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

Very truly yours,

A handwritten signature in cursive script, reading "J. H. Goldberg".

J. H. Goldberg
Group Vice President, Nuclear

FAW/yd

Attachment: Response to Notice of Violation (8501-01)

8509200150 850916
PDR ADOCK 05000498
G PDR

IC-120/85

W2/NRC2/o

cc:

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

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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
50-498/8501-01
50-499/8501-01

I. Statement of Violation

Based on the results of an NRC inspection conducted during the period from January 1 to February 28, 1985, in accordance with NRC Enforcement Policy (10CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violation was identified:

Failure to Properly Follow Procedure

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.

Specifically, OQAP, Section 4.0, paragraph 6.2.1.2, requires participation in a QA program indoctrination and paragraph 7.0 requires records be maintained. Additionally, SAI (Startup Administrative Instruction) 10, "Indoctrination, Training, and Certification of Test Personnel," requires training and certification documentation be maintained by RMS (Records Management System) with copies in the Startup Training Office.

Contrary to the above, the NRC inspector reviewed five sets of training and certification files for senior or long-term startup personnel. One file was missing a supervisor's signature and in the same file a signature was placed in the wrong location. One file had no documentation of the required QA lecture although the index stated he attended. The Startup Manager had not attended the required QA lecture which is a requirement prior to conducting safety-related activities.

II. Reply

SAI 10 requires that training and certification documentation be maintained with appropriate personnel signatures. Startup personnel had improperly signed or failed to sign certification documentation which verified that self-read training was completed.

This resulted from Startup personnel inattention to the requirements of signature on the records sheet. SAI 10 has been revised to include a modification to the startup training form to clarify signature requirements and indicate proper location of required signatures. Additionally, the individual's file, whose supervisor's signature was missing and where a signature had been placed in the wrong location, has been updated and corrected by using the modified training form which resulted from the revision to SAI 10.

The individual whose file was missing documentation of his attendance of the QA Indoctrination Lecture had attended the lecture on the date stated on the certification index. Startup Training completed their review of all other Startup training files on March 15, 1985 and found no other deficiencies. The required attendance documentation was added to his file.

OQAP Section 4.0 requires participation in the QA indoctrination program and that records be maintained of that participation. The Startup Manager had not attended the QA indoctrination lecture as required. The Startup Manager did attend the QA Indoctrination on March 5, 1985. Prior to this date, no safety-related testing activities had been conducted.

III. Corrective Action Taken or to be Taken

The review of the Startup training files found no other discrepancies; we believe this is an isolated occurrence. The records of the individual whose file was missing documentation were located and added to the file. The record that contained a signature in an improper location has been corrected in accordance with the modified startup training form. The Startup Manager attended QA Indoctrination on March 5, 1985.

IV. Steps Taken or to be Taken to Avoid Further Violations

SAI 10 has been revised to include modified Startup training forms that clarify signature requirements. The Startup Manager has re-emphasized to all Startup personnel the importance of proper QA documentation for required training.

V. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 5, 1985.