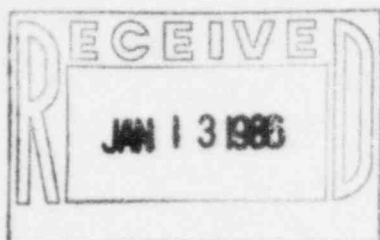


The Light company

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



January 9, 1986
ST-HL-AE-1569
File No.: G12.252

Mr. Robert D. Martin
Regional Administrator, Region IV
U. S. 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 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 had been accepted by the Constructor's Quality Control (QC). Attached is the final report concerning this item which has been determined to be reportable under 10CFR50.55(e).

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

Very truly yours,

A handwritten signature in cursive script that reads "J. H. Goldberg".

J. H. Goldberg
Group Vice President, Nuclear

PCL/MEP/yd

Attachment: Final Report Concerning
Pipe Support Deficiencies

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CC:

Hugh L. Thompson, Jr., Director
Division of PWR Licensing - A
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

T.V. Shockley/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
Christic Institute
1324 North Capitol Street
Washington, DC 20002

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, DC 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
(3 Copies)

Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
1717 H Street
Washington, DC 20555

Revised 12/2/85

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

Summary

On May 30, 1985 Houston Lighting & Power Company (HL&P) notified NRC Region IV of deficiencies identified by QA Effectiveness Inspections (EI) and the Pre-CAT Verification Team (PCVT) on safety-related pipe supports that had been previously accepted by Quality Control (QC). All final inspections of safety-related supports were stopped and a reinspection program was initiated. The reinspection program, which was completed on December 6, 1985, has resulted in re-working approximately 25% of the supports reinspected. HL&P has determined that this deficiency is reportable under 10CFR50.55(e).

Description of Deficiency

HL&P QA Effectiveness Inspections have been established for monitoring the Constructor's QC program to identify problems for corrective action. Under the cognizance of the ongoing EI program, a limited reinspection of safety-related pipe supports that had been accepted by QC was conducted. 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). In the same time frame, similar nonconforming conditions were found by HL&P's Pre-CAT Verification Team (PCVT) during their inspection.

At the time of these inspections, approximately 20% of the safety-related large bore pipe supports for Unit 1 had been accepted by 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.), on May 28, 1985, the Constructor stopped all final inspections pending completion of a joint appraisal by HL&P/Bechtel/Ebasco.

Corrective Actions

The pipe support installation specification and the QC inspection procedures have been revised to enhance their implementation and to provide clarifications and simplifications. The QC inspectors were trained to the revised procedures with emphasis on the areas of concern identified by the EI and PCVT. Additional training was provided to the craft personnel and non-manual personnel. The final inspection of on-going work on safety-related pipe supports was resumed in mid-July.

A reinspection program for all safety-related pipe supports, previously accepted by QC, was initiated in early August and completed on December 6, 1985. The reinspection was monitored by HL&P QA Effectiveness Inspection Program. Approximately 25% of the reinspected supports will require re-work.

Recurrence Control

The pipe support construction and the QC inspection procedures have been consolidated into a Standard Site Procedure and implemented in mid-December to:

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

The corrective action is being monitored by Constructor's QA and QC through scheduled and unscheduled surveillance. HL&P's EI Program conducts a separate second-line inspection on a random basis after the acceptance by Construction and QC.

Safety Analysis

This deficiency represents a breakdown in the Quality Assurance Program which resulted in an extensive amount of re-work. The safe operation of the plant could not be assured without correcting this deficiency. Therefore this deficiency is reportable under 10CFR50.55(e).