

MAR 07 1986

In Reply Refer To:  
Dockets: 50-498/85-19  
50-499/85-17

Houston Lighting & Power Company  
ATTN: J. H. Goldberg  
Group Vice President, Nuclear  
P. O. Box 1700  
Houston, Texas 77001

Gentlemen:

Thank you for your letter of February 10, 1986, in response to our letter and Notice of Violation (NOV) dated January 29, 1986. As a result of our review, we find that additional information is needed regarding your response to Item 2 of the NOV as discussed by C. McIntyre and S. Head of your staff and our Senior Resident Inspector, C. E. Johnson, on or about February 19, 1986. Please provide the supplemental information within 30 days of the date of this letter.

Sincerely,

Original Signed By  
J. E. Gagliardo

J. E. Gagliardo, Chief  
Reactor Projects Branch

cc:  
Houston Lighting & Power Company  
ATTN: M. Wisenberg, Manager,  
Nuclear Licensing  
P. O. Box 1700  
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Brian Berwick, Esquire  
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(cont. on next page)

RIV:SRI  
CEJohnson/lr  
3/1/86

RPB/C  
GConstable  
3/1/86

RPB  
JEGagliardo  
3/1/86

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Q PDR

Houston Lighting & Power Company

-2-

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Texas Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:

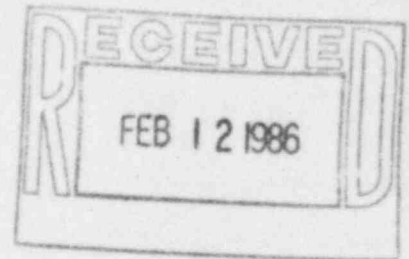
RPB  
Resident Inspector-OPS  
Resident Inspector-CONST.  
R&SPB  
RSTS Operator  
R. G. Taylor, RPB/C

DRSP  
R. D. Martin, RA  
Section Chief (RPB/C)  
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# The Light company

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

February 10, 1986  
ST-HL-AE-1607  
File No.: G2.4



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 8519-01/8517-01

Dear Mr. Martin:

Houston Lighting and Power Company (HL&P) has reviewed Notice of Violation 50-498/8519-01, 50-499/8517-01 dated January 29, 1986 and submits the attached response pursuant to 10CFR2.201.

If you should have any questions regarding this matter, please contact Mr. Scott Head at 512-972-8392.

Very truly yours,

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

J. H. Goldberg  
Group Vice President, Nuclear

JHG/SMH/mg

Attachment: Response to Notice of Violation (8519-01 and 8517-01)

L1/NRC/nv

~~8643194397~~ 67D

IC-022/86

Houston Lighting & Power Company

cc:

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

Revised 12/2/85

South Texas Project  
Units 1 & 2  
50-498/8519-01  
50-499/8517-01

I. Statement of Violation

During an NRC inspection conducted on September 30 through November 22, 1985, one violation of NRC requirements was identified. The violation involved failure to follow procedures. In accordance with the "Generic Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Criteria V of Appendix B to 10 CFR Part 50 requires activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings. This requirement is amplified by the approved QAPD (Quality Assurance Plan Description) for South Texas Project.

QCP 9.1, Revision 6, paragraph 5.4.2.A.1, states that the QC supervisor will assure, during final review, that the Weld Process Sheets (WPS), welder ID, and material reference number, recorded on the Filler Material Issue Report (FMIR) contained in the weld package, are documented on the Process Data Checklist (PDC) or Multiple Process Data Checklist (MPDC).

Contrary to the above, the following discrepancies were noted in packages EW1329HL5003, EW1114HL5001, EW1107HL5003, EW1114HL5003, EW1229HL5003, and EW1130HL5002 after the support packages were transmitted to the RMS vault.

1. Some FMIRs for some of the supports listed welders who appeared to have performed work on the support but were not identified on the MPDC.
2. Some FMIR material reference numbers (heat numbers) were not documented on the MPDC.

This is a severity level V violation (supplement IE) (498/8519-01).

II. Reply

The discrepancies noted by the NRC in Item 1 of the Notice of Violation (NOV) have essentially one basic cause. Specifically, during the welding process for supports, Quality Control Inspectors are not required to be present during the entire installation. Thus welder changes may not be noted on MPDC/PDC checklist. As a result of this problem, Quality Control Procedure 10.12 required that the QC Supervisor during final review annotate all MPDC/PDC's with information obtained from FMIR's



contained within the package. This review effort apparently was not adequately performed in isolated cases. In addition, the Site Integrated Review Group (SIRG) review criteria for packages did not address the use of FMIR's since even though contained in the package, they are not considered Quality Records. The SIRG review took place after records were submitted to RMS.

The above situation is not indicative of a hardware problem (As noted in the NOV). The program for welder qualification at STP assures a high level of confidence that all welders are qualified for the welding they perform. For example, before rod is issued to a welder his qualifications are verified to insure that the welder is qualified for that particular welding procedure.

The corrective actions taken relative to the problems addressed above will be described in Section III below.

Concerning Item 2 of the NOV, during the time frame when the records in question were prepared, site procedure QCP 10.12 did not require the listing of the Filler Material Reference Number (equivalent to heat number) on the MPDC/PDC's for Class II and III supports. All supports reviewed were from the Class III Essential Cooling Water System. Therefore, this portion of the NOV does not constitute a violation of NRC requirements.

### III. Corrective Actions Taken and Results Achieved

Relative to Item 1 of the NOV, the following actions are being undertaken.

- o All MPDC/PDC's with discrepant conditions noted in the NOV, plus those found in the related HL&P investigation (documented in Standard Deficiency Report 194) have been corrected.
- o The generic concern about the quality of other support record packages already reviewed by SIRG is addressed as follows:
  - 1. For Class II and III supports the Ebasco QA program requires an accurate transfer of all welder information to the MPDC/PDC. However, the ASME Code only requires that all welders be qualified for the processes involved. As noted in II. above, the welder qualification program at STP assures a high level of confidence that all welders are qualified for the work they perform. Therefore, since it can be concluded that the ASME requirements are in fact met, no further action will be taken relative to Class II and III packages.

2. For Class I supports, the ASME Code requires that all welders be identified on the appropriate documentation (i.e., on MPDC/PDC). Since the discrepancies noted in the NOV and related HL&P investigation bring into question the completeness of the information on the MPDC/PDC, special action must be taken relative to Class I packages. Specifically, for those Class I packages that contain FMIR's that were reviewed by SIRG prior to including FMIR's in the SIRG review criteria, a sample will be taken to determine the level of confidence that accurate information has been recorded on the MPDC and PDC. This sample and evaluation will be completed by February 14. If problems are found, a complete review of Class I packages will be performed. This review and any required corrections will be completed by March 7, 1986.

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

Standard Site Procedure SSP-18 "General ASME III Welding Requirements", has been revised to address the discrepancies noted in this NOV. This procedure defines with greater clarity the responsibilities for Welding, Construction and Quality Control personnel. Specifically, SSP-18 has transferred the responsibility for entering Weld Filler Material information and Welder Identification from the FMIR's, as well as Welding Procedures/Supplements Revision on the MPDC/PDC, from Quality Control to the Construction Foreman. The revision was implemented on December 3, 1985.

Quality Control insures that Welders listed on the MPDC have actually performed welding. This is verified during in-process activities, at final inspection by marking or stamping of the Welder's Symbols at or adjacent to the weld joint, or at final record review.

As noted in II. above, the procedure in effect at the time the records cited in the NOV were generated required that the FMIR's be in the support package to facilitate the QC supervisor's review. As a result of the revision to SSP-18 with its enhanced requirements for documenting and verifying the welder and welding information, the FMIR is no longer required to be in the package.

In addition, for those packages currently in process which were required to contain FMIR's, the Site Integrated Review Group has been directed to verify that all MPDC/PDC's correctly reflect the information on the FMIR's.

V. Date When Full Compliance Will Be Achieved

From a procedural standpoint, HL&P is in full compliance at this time. As noted above, required corrective action could continue until March 7 to correct deficiencies found in Class I packages.