

The Light company

Houston Lighting & Power

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

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

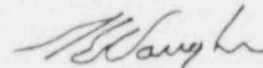
South Texas Project Electric Generating Station
Unit 1

Docket No. STN 50-498

Response to Notice of Violation 8775-01

Houston Lighting & Power Company has reviewed Notice of Violation 8775-01 dated February 23, 1988, and submits the attached response pursuant to 10CFR2.201.

If you should have any questions on this matter, please contact Mr. S. M. Head at (512) 972-8392.



G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/WPE/pw

Attachment: Response to Notice of Violation 8775-01

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A Subsidiary of Houston Industries Incorporated

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PDR ADOCK 05000498
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cc: (without attachments)

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

N. Prasad Kadambi, Project Manager
U. S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Pike
Rockville, MD 20859

Dan R. Carpenter
Senior Resident Inspector/Operations
c/o U. S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

Don L. Garrison
Resident Inspector/Construction
c/o U. S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

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

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

R. John Miner (2 copies)
Chief Operating Officer
City of Austin Electric Utility
721 Barton Springs Road
Austin, TX 78704

R. J. Costello/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 1700
Houston, TX 77001

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, Ga. 30339-3064

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-498
Response to Notice of Violation 8775-01

I. Statement of Violation

Failure to Comply with Technical Specifications for Operability of the Chemical Detection System

The South Texas Project Electric Generating Station (STPEGS) Technical Specifications (TS), Section 3.3.3.7, requires a minimum of one (1) Chemical Detection System (CD) operable to maintain operation of the Control Room Emergency Ventilation System for all modes of plant operations.

Contrary to the above requirement, the plant operated in Mode 4 during the period from December 4 to December 6, 1987, with both control room toxic gas monitors in the "Not in the Analyze Mode." This condition would have prevented the automatic isolation of the control room in the event of a toxic gas accident.

II. Houston Lighting & Power Position

As stated in Licensee Event Report 87-022, HL&P concurs that the cited violation occurred. The following is a description of the event.

At approximately 0530 hours on December 6, 1987 with the Unit in Mode 4 and prior to initial criticality, it was discovered that both Control Room Toxic Gas Monitors were out of service. The control room ventilation was immediately placed into recirculation mode in accordance with the requirements of Technical Specification 3.3.3.7 action statement b. At approximately 0653 hours both monitors were verified operational. An investigation was initiated to determine the sequence of events which resulted in both toxic gas monitors being out of service.

The ensuing investigation concluded that at approximately 1200 hours on December 4, 1987 a reactor plant operator in training for control room operator, incorrectly performed the required channel checks on both toxic gas monitors (two toxic gas monitors are used to monitor the control room intake air). The operator issued commands through a keyboard to obtain current readings from the Toxic Gas Monitor System but failed to return the monitors to normal service.

The operators were using two different methods to perform the Technical Specification channel check. One method was to compare eight hour automatically generated printouts. The second method was to initiate, through keyboard commands, a current printout of the monitored gas readings. In both methods the Toxic Gas indicating lights and trouble lights were checked for indication of possible system trouble.

The second method used to perform the channel check placed the computer in the summary mode. With the computer in the summary mode, the actuation function of the monitors is disabled. When the monitor is returned to normal operation the monitoring resumes. Indicating and status lights remain in their normal configuration throughout this method of channel check. If a keyboard error is made in returning the monitors to service, the indicating and status lights will remain in their normal configuration.

The operators who performed subsequent channel checks did not recognize that the monitors were out of service because the monitors continued to printout data even though the data was not meaningful and indicating lights remained normal. The monitors were determined to be inoperable when one of the operators recognized that the readings differed from previous channel checks he had performed.

The NRC was notified of the occurrence at 2050 hours on December 7, 1987.

III. Reason for Violation

The root causes of this violation are a failure to provide adequate training on the operation of the Toxic Gas Monitoring System equipment and the performance of channel checks, lack of positive indication of system status, and lack of procedural guidance.

IV. Corrective Action Taken and Results Achieved

The following corrective actions have been taken in response to this violation:

1. Houston Lighting & Power Company (HL&P) reported this event pursuant to 10CFR50.72 and submitted Licensee Event Report 87-022 (see correspondence ST-HL-AE-2471, dated January 7, 1988) pursuant to 10CFR50.73.
2. The Toxic Gas Monitors have been reprogrammed such that operators will not be required to manipulate the system to perform channel checks.

3. Additional training was conducted on the proper operation and use of the Toxic Gas Monitors for Unit 1. HL&P has reviewed and revised, as necessary, the on-the-job training program for operator rounds and channel checks in general to ensure effectiveness of training.
4. The log keeping procedure was revised to provide adequate instructions for performing channel checks on the Toxic Gas Monitors. HL&P has reviewed and revised, as necessary, other operator logs for channel check requirements.
5. HL&P has evaluated the feasibility of a positive method for determining the operability of the Toxic Gas Monitoring System. Separate annunciator windows will be provided in the control room for the HI toxic gas signal and the Malfunction/Loss of Power signals. This modification will be completed prior to restart from the next refueling outage.
6. Plant briefings were conducted and the Plant Conduct of Operations procedure was revised to specifically designate how trainees can be used.

V. Corrective Steps Taken to Prevent Recurrence

The actions described in section IV above will prevent recurrence of this violation.

VI. Date of Full Compliance

HL&P is in full compliance at this time. Additional plant improvements will be completed prior to restart from the next refueling outage.