



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

May 18, 1992

Docket Nos. 50-498  
and 50-499

Mr. Donald P. Hall  
Group Vice-President, Nuclear  
Houston Lighting & Power Company  
P. O. Box 1700  
Houston, Texas 77251

Dear Mr. Hall:

SUBJECT: REQUEST FOR EXEMPTION FROM 10 CFR 50.62, SOUTH TEXAS PROJECT,  
UNITS 1 AND 2 (TAC NOS. M82521 AND M82522)

By letter dated December 12, 1991 (ST-HL-AE-3916), Houston Lighting & Power Company (HL&P) requested an exemption from the requirements of 10 CFR 50.62, "Requirements for Reduction of Risk from Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants" (ATWS rule) for the South Texas Project, Units 1 and 2 (STP). For STP the requirements of 10 CFR 50.62 are met by the incorporation of the Anticipated Transient Without Scram Mitigating System Actuation Circuitry (AMSAC).

The HL&P letter stated that the request for the exemption was based on the design features of STP, which make the contribution of the AMSAC system insignificant in the mitigation of ATWS events. Elimination of the AMSAC system would reduce maintenance, simplify operator training and operating procedures, and reduce the possibility for system interactions, some of which could lead to unnecessary plant trips. The risk analysis upon which the conclusions were based was performed as part of the STP Probabilistic Safety Assessment (PSA).

We have reviewed the submittal and justification for removal of the AMSAC system. The staff appreciates the quality and level of detail of the exemption request as well as the robust design of STP. Also, in our evaluation of the PSA, we concluded that it is a state-of-the-art Level 1 risk assessment which has a good level of modeling detail and engineering analysis. However, plant design features, risk analysis, training, and procedures were discussed and considered in detail prior to promulgation of the ATWS rule. Further, when considering the long standing concerns with the reliability of the reactor protection system, as well as the uncertainties associated with the application of probability risk analyses, the staff concluded that

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by adhering to the ATWS rule, an additional measure of protection is provided for the public. The staff continues to believe that independent and diverse protection from the reactor protection system should be provided for auxiliary feedwater actuation and turbine trip for Westinghouse plants. Therefore, the request for exemption from 10 CFR 50.62 is denied.

Sincerely,

Original Signed By

Bruce A. Boger, Director  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

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