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Houston Lighting & Power

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November 7, 1989
ST-HL-AE- 3285
File No.: G3.03
10CFR50

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

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Response to NRC Bulletin 88-10, Supplement 1

Reference Letter from S. L. Rosen, HL&P, to NRC Document Control Desk, dated June 30, 1989 (ST-HL-AE-3150)

The referenced letter is HL&P's final report addressing Bulletin 88-10 regarding Nonconforming Molded-Case Circuit Breakers (MCCBs). HL&P has reviewed its responses to the Bulletin, and compared them to the NRC positions described in Supplement 1 to the Bulletin. HL&P believes that all provisions of the Bulletin and its supplement have been addressed as required. Specific responses to the NRC positions in the supplement are provided in the attachment. Documentation of the MCCB review substantiating the HL&P responses is available on site.

If you have any questions, please contact Mr. A. W. Harrison at (512) 972-7298.

S. L. Rosen
Vice President
Nuclear Engineering and Construction

SLR/AWH/nl

Attachment: Responses to NRC Positions in IEB 88-10 Supplement 1

A1/030.NL9

IE21
1/1

cc:

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter	)	
	)	
Houston Lighting & Power	)	Docket Nos. 50-498
Company, et al.,	)	50-499
	)	
South Texas Project	)	
Units 1 and 2	)	

AFFIDAVIT

S. L. Rosen being duly sworn, hereby deposes and says that he is Vice President, Nuclear Engineering and Construction of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached update relative to NRC Bulletin 88-10; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.

S L Rosen

S. L. Rosen
Vice President,
Nuclear Engineering and Construction

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 7th day of NOVEMBER, 1989.

JACKIE A. GAULT
Notary Public, State of Texas
My Commission Expires 1-13-93

Jackie A Gault

Notary Public in and for the
State of Texas

A1/030.NL9

RESPONSES TO NRC POSITIONS IN IEB 88-10, SUPPLEMENT 1

1. If CBs are traceable to an original plant construction order and the CBs were received prior to August 1983, there is reasonable assurance that the CBs are acceptable and no additional traceability is required.

   STP Response: The STP traceability review encompassed the period from August 1983 to December 1988.

2. Visual inspection and physical examination of the CBs by the CBM is not considered adequate to meet the requested traceability provisions of Bulletin No. 88-10. Although visual inspection and physical examination by the CBM may provide a reasonable basis that the CBs have not been opened or altered in a substantial way, there is no reasonable assurance that the CBs have not been previously used or subjected to service conditions that may have adversely affected the performance capabilities of the CBs.

   STP Response: STP did not use CBM inspection of safety-related MCCBs as a basis for considering a MCCB as traceable.

3. Item 4 of the actions requested in Bulletin No. 88-10 applies only to CBs that were purchased and installed after August 1, 1983.

   STP Response: Traceability was determined for MCCBs received at the South Texas Project (STP) between August 1983 and December 1988. Only 6.5% of the MCCBs received were determined to be untraceable.

4. If an addressee identifies any CBs as nontraceable during the review requested by Bulletin No. 88-10, it should take appropriate corrective actions as required by Criterion XVI of 10 CFR Part 50, Appendix B. As part of these corrective actions, the NRC expects addressees to assess the acceptability of all installed safety-related CBs that were procured under the same purchase orders as the nontraceable CBs.

STP Response: Corrective actions have been taken for those MCCBs which were found to be untraceable. Untraceable MCCBs in the warehouses have been segregated and are in hold areas.

Untraceable MCCBs installed in the field were documented and continued operation with the subject breakers in place was justified. The Unit 1 untraceable MCCBs were replaced in the first refueling and the Unit 2 untraceable MCCBs will be replaced before restart after the Unit 2 first refueling outage. Traceability was verified for Safety-related MCCBs that were procured under the same purchase orders as nontraceable MCCBs.

Note: Safety-related spare or replacement MCCBs were not received at STP prior to August 1983 for those P.O.s where there were determined to be untraceable MCCBs.

5. In an effort to limit the number of nonconforming CBs in safety-related systems, nontraceable CBs that were installed or are being maintained as stored spares as of August 1, 1988, and that successfully pass all tests specified in Attachment 1 of Bulletin No. 88-10 are considered acceptable for use only as replacements for safety-related CBs that are found to be nontraceable during the review requested by Bulletin No. 88-10. These breakers may not be used as safety-related replacements during other activities such as planned plant modifications or routine maintenance.

STP Response: For safety-related applications, only traceable MCCBs are being maintained as spares or used as replacements.

6. For CBs stored as spares that were not procured directly from the CBM, each individual CB should be reviewed in order to establish proper traceability, regardless of the number of CBs.

STP Response: MCCBs received at STP from August 1983 to December 1988, whether they are spares or permanent replacements, have been investigated to determine traceability back to the original manufacturer. A documentation trail was confirmed for traceable MCCBs.

7. All safety-related CBs from the same procurement order are considered traceable provided that 1) the order was procured directly from a CBM having a quality assurance program in accordance with 10 CFR Part 50, Appendix B, 2) the CBM has been audited by the addressee in accordance with Appendix B, 3) the CBs were ordered as safety-related, and 4) documented evidence has been furnished to the addressee, such as a certificate of compliance. However, if safety-related CBs were procured from a vendor other than the CBM, a certificate of compliance by itself is not considered an adequate basis for establishing traceability. In such cases, traceability of individual procurement orders should be established through the review of procurement or shipping records back to the CBM. Telephone discussions with the CBM or vendor are not acceptable for establishing a basis for traceability. Traceability to a warehouse facility controlled by the CBM is considered equivalent to traceability to the CBM.

   STP Response: See response to position No. 6 above.