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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

July 17, 1980

In Reply Refer To:
RIV
Docket No. 50-498
50-499

Houston Lighting and Power Company
ATTN: Mr. G. W. Oprea, Jr.
Executive Vice President
Post Office Box 1700
Houston, Texas 77001

Gentlemen:

Thank you for your letter ST-HL-AE-472 of May 30, 1980, that transmitted your final report of a 50.55(e) item, "Safety Injection System Piping Deficiency." In review of your report, we find that additional information is required. Specifically, as discussed by Mr. Hubacek of this office with Messrs. Rodgers and Hernandez of your staff on July 9, 1980, clarification of penetration details as shown on Figure 1 of the subject report is required. The clarification should address disposition of the seal weld between the process pipe and the emergency sump liner.

Please provide us with the additional information within 30 days of receipt of this letter.

Should you have any questions concerning this matter, please contact this office.

Sincerely,

W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch

The Light company

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

May 30, 1980
ST-HL-AE-472
SFN: V-0530

Director, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76102

Dear Sir:

South Texas Project
Units 1 & 2
Final Report on the Safety
Injection System Piping Deficiency

On October 25, 1979, pursuant to 10 CFR 50.55(e), Houston Lighting and Power Company notified your office of a deficiency in the Safety Injection System containment emergency sump piping design. The Interim Report of March 19, 1980, indicated that if the second design alternative (i.e. anchoring the process pipe to the guard pipe) was found to be acceptable, a final report would be submitted by May 30, 1980. In response to that commitment, attached is the final report.

Questions concerning this matter should be directed to Mr. Shawn Rodgers at (713) 676-7953.

Very truly yours,



E. A. Turner
Vice President
Power Plant Construction
& Technical Services

MP/mmF
Attachment*

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FINAL REPORT

SAFETY INJECTION SYSTEM PIPING DEFICIENCY May 30, 1980

I. SUMMARY

During a routine design review, a design deficiency was discovered in a Safety Injection System (SIS)/Containment Spray System (CSS) containment emergency sump piping design. The weld between the sump liner and the process pipe was not sufficient to carry the design loads. If left uncorrected, a failure of the weld joint would create stresses in the associated recirculation valve that would exceed the design criteria. Failure of this valve to open would prevent the SIS/CSS from performing its intended function of mitigating the consequences of an accident. The deficiency will be corrected by anchoring the SIS/CSS process pipe to the guard pipe outside of the containment building and the addition of an expansion joint to the process pipe inside the emergency sumps. Engineering procedures will be revised to require all design not previously subject to the present design verification program to be re-design verified consistent with current Engineering procedures.

II. DESCRIPTION OF THE INCIDENT

During a routine review, a design deficiency was discovered which, if left uncorrected, could have adversely affected the safety of operations. The joint between the 16 inch Safety Injection System piping and the emergency sump liner was shown on the construction drawing to be a one-quarter inch seal weld, which does not meet the design load criteria.

The piping is part of the SIS and CSS and leads from the containment emergency sump through the containment sump isolation valve to the safety injection and containment spray pumps. Following a LOCA, water will automatically be recirculated from the emergency sumps to the reactor by the Safety Injection System. Operation of the containment emergency sump isolation valve is required for recirculation mode operations. The seal weld in question attaches the process pipe to the sump liner.

III. CORRECTIVE ACTION

When this deficiency was discovered, the Engineer who identified the problem reported it on an Engineering Design Deficiency Report (EDD 79-39) as required by Engineering procedures.

This deficiency will be corrected by anchoring the process pipe to the guard pipe outside the containment building and adding an expansion joint to the process pipe inside the emergency sumps (see Figure 1).

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Attachment

In determining that this installation is acceptable, the following factors and limitations were checked and verified as satisfactory:

- Pipe Stresses
- Recirculation Valve End Loads
- Safety Injection Pump Load Limits
- Sump Liner Load Limits
- Containment Penetration Sleeve Load Limits
- Differential Settlement Criteria
- Containment Pressure Boundary Continuity
- Process Pipe and Guard Pipe Should Not Impact During a Seismic Event
- Constructability

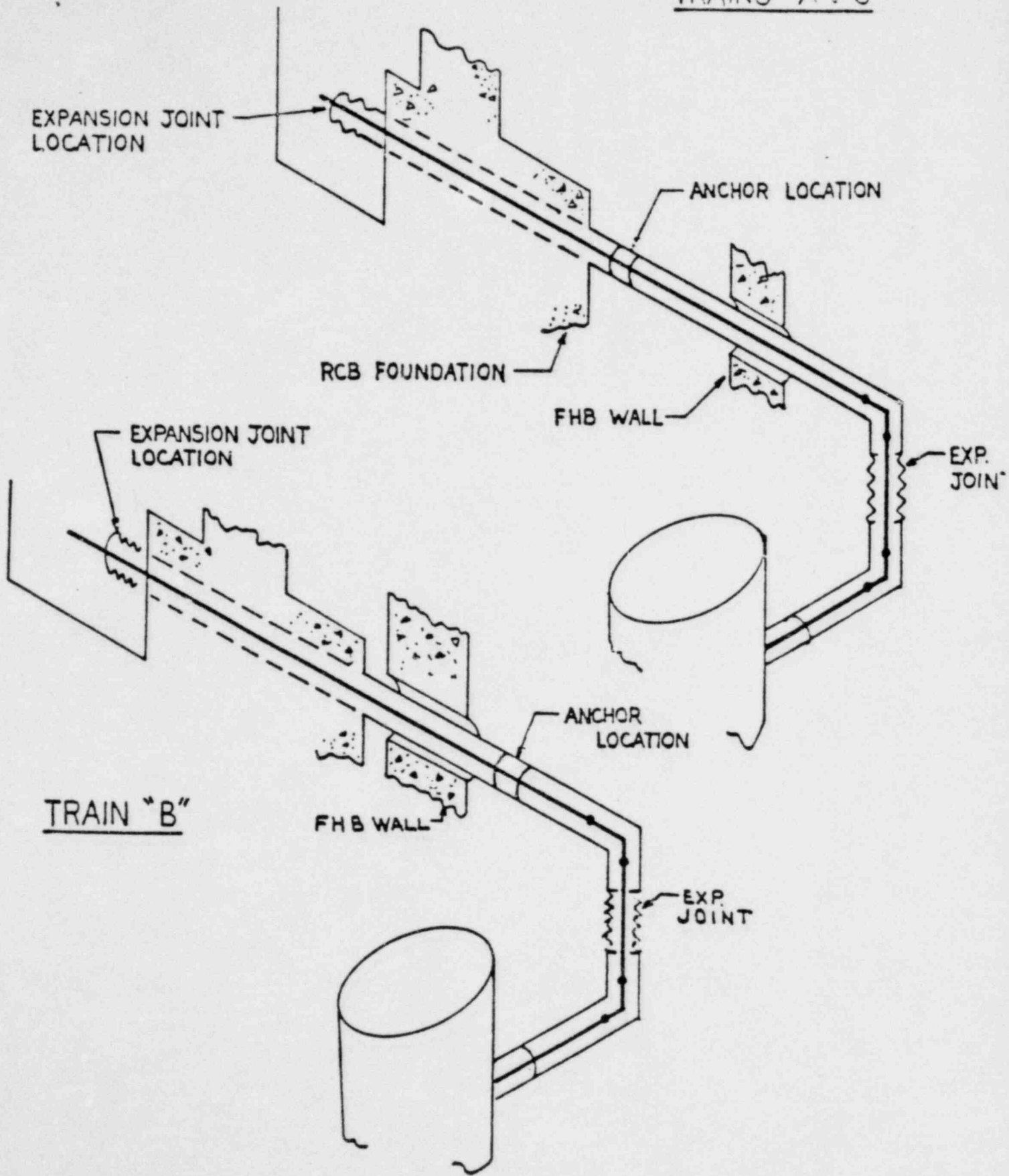
IV. RECURRENCE CONTROL

Early in the STPEGS program, any engineer could perform verification on a design so long as he was qualified and met the independence requirements. As the result of an error found in the design of structural steel members (as documented in ST-HL-AE-346 dated June 5, 1979), it was found that the quality of the design verification program was being compromised by the pressures of meeting schedules. This program was then substantially revised. Each discipline was required to appoint individuals whose primary duties were that of the performance of design verification. By procedure, each design verifier was to be given as much time as he needed to perform the verification task and each individual assigned to the verification function was made responsible to the Project Quality Engineer for the quality of this work. This program was placed into effect in January, 1979. This error occurred prior to the implementation of this procedural change. This deficiency indicates, however, that the adequacy of verification of designs issued prior to January, 1979 may require further evaluation. Therefore, designs issued prior to January, 1979 will be re-design verified consistent with current Engineering procedures. This requirement will be added to the procedures before June 30, 1980. Reverification will be completed on a routine basis as documents are revised but, as a minimum prior to records turn-over and prior to fuel load.

V. SAFETY ANALYSIS

If this deficiency were to have been left uncorrected, the weld at sump liner/process pipe interface could fail. The process pipe would then be free of restraint and would impose a load on the recirculation valve which exceeds the allowable end loads. It could not then be guaranteed that the valve would operate as required. Because this problem affects all three trains, this is a common mode failure which could cause loss of safety system functions.

TRAINS "A" & "C"



TRAIN "B"

FIGURE - 1