

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

January 28, 1992
ST-HL-AE-3962
File No.: G03.08
10CFR50.54(f)

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

South Texas Project
Units 1 and 2
Docket Nos. 50-498, STN 50-499
Response to NRC Generic Letter 91-11,
"Resolution of Generic Issues 48, 'LCO for Class 1E Vital
Instrument Buses', and 49, 'Interlocks and LCOs for
Class 1E Tie Breakers' Pursuant to 10CFR50.54(f)"

Pursuant to 10CFR50.54(f), Houston Lighting & Power Company (HL&P) submits this response to Generic Letter 91-11 for the South Texas Project (STP).

STP design and procedures have been reviewed, and HL&P has determined that no modifications or revisions are necessary. Responses to the specific concerns of the Generic Letter are provided on the attachment.

If there are any questions, please contact either Mr. P. L. Walker at (512) 972-8392 or me at (512) 972-7138.



S. L. Rolan
Vice President,
Nuclear Engineering

PLW/lf

Attachment: Response to Generic Letter 91-11

030095

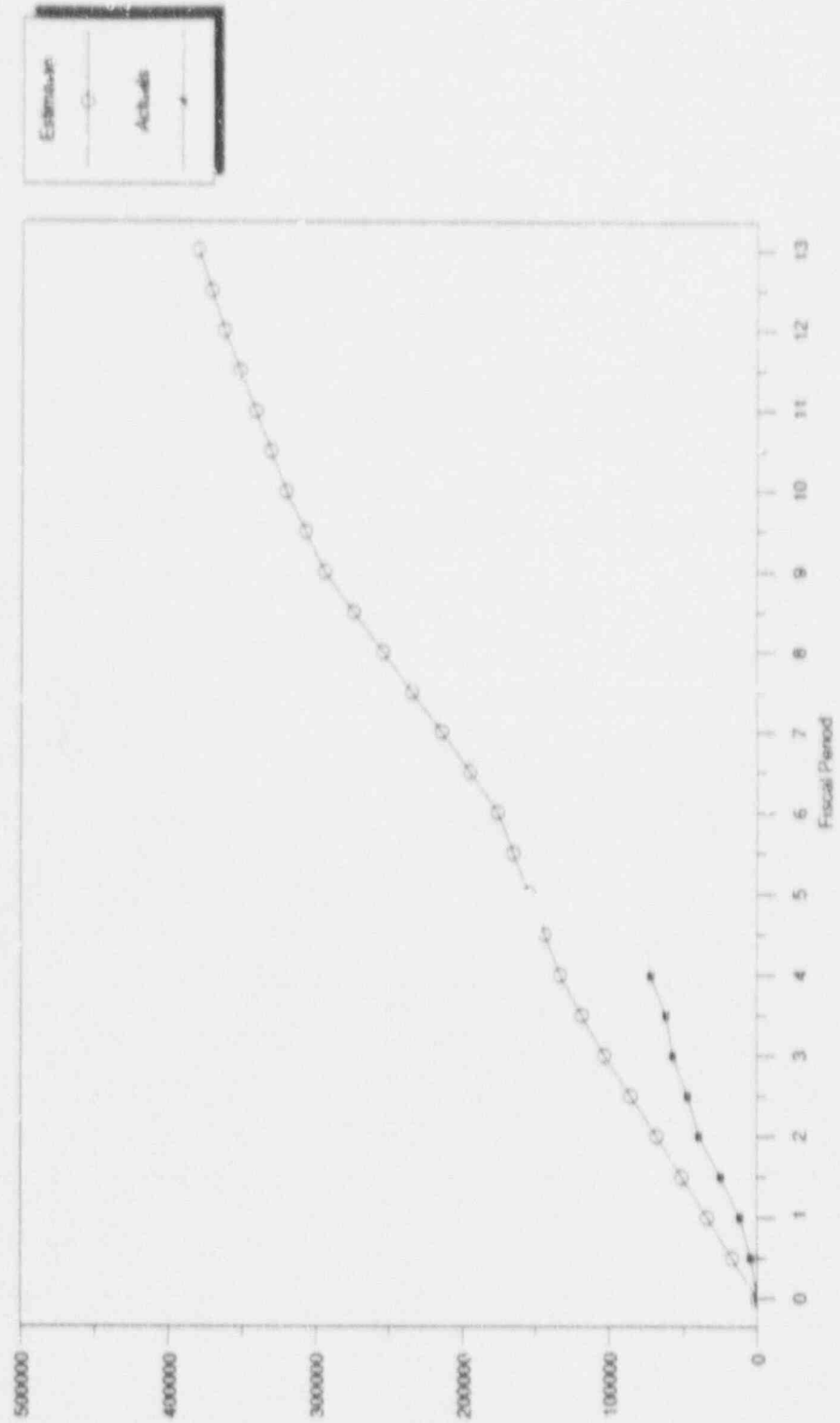
GLB\91-336.001

A Subsidiary of Houston Industries Incorporated

9202040229 920128
PDR ADOCK 05000498
P PDR

A027
1/1

3704-000 Overall Research



Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-3962
File No.: G03.08
Page 2

cc:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Georg. Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
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

D. E. Ward/T. M. Puckett
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
P.O. Box 1088
Austin, TX 78767

K. J. Fiedler/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 62867
Houston, TX 77208

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

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

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 10/11/91

L4/NRC/

3704-010

GEOCHEM

Element Status Cost Report

ITEM	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
BEST PERIOD COST	19371	19573	10210	19528	19337	19431	19170	19551	19138	19697	19267	19481	16217	77682
ACT. PERIOD COST	16663	11054	18091	23698	0	0	0	0	0	0	0	0	0	69505
VARIANCE, \$	2708	8519	1119	-4170	0	0	0	0	0	0	0	0	0	-8177
VARIANCE, %	14.0	43.5	5.8	-21.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.5
BEST. FY CUMUL	19371	38944	58154	77682	97019	116451	135620	155171	174209	193995	213303	232783	249080	
ACTUAL FY CUMUL	16663	27717	45907	6305	0	0	0	0	0	0	0	0	0	
PERCENT COMPLETE	0.067	0.111	0.184	0.079	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
VARIANCE, \$	2708	11227	12346	8377	0	0	0	0	0	0	0	0	0	
VARIANCE, %	14.0	28.8	21.2	10.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

NOTES:

1. All Estimated and actual costs exclude award fee.
2. Estimates are taken from November 1991 Operations Plan or Project Plan.
3. TOTAL column reflects YTD total.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)

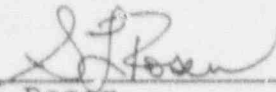
Houston Lighting & Power)
Company, et al.,)

Docket Nos. 50-498
50-499

South Texas Project)
Units 1 and 2)

AFFIDAVIT

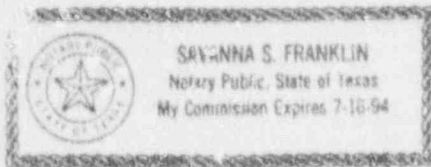
S. L. Rosen being duly sworn, hereby deposes and says that he is Vice President, Nuclear Engineering of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to NRC Generic Letter 91-11; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.




S. L. Rosen
Vice President,
Nuclear Engineering

STATE OF TEXAS)
)
)

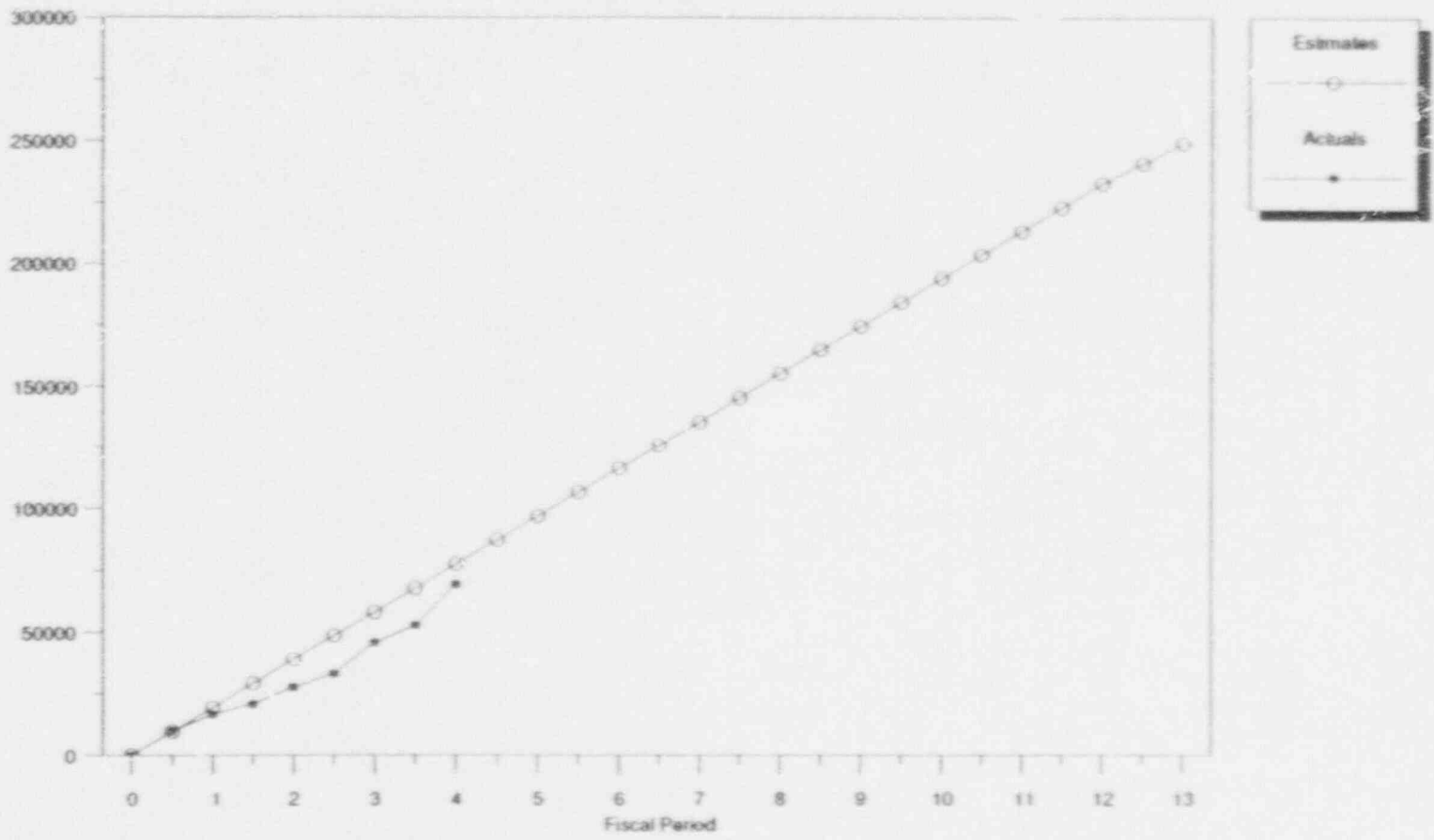
Subscribed and sworn to before me, a Notary Public in and for The State of Texas this *28th* day of *January*, 1992.





Notary Public in and for the
State of Texas

3704-010 Geochemistry



South Texas Project
Units 1 and 2
Response to NRC Generic Letter 91-11

1. Procedures should limit the time that a plant is in possible violation of the single-failure criterion with regard to.
- a) Vital instrument buses (typically 120 VAC buses)
 - b) Inverters or other onsite power sources to the vital instrument buses.
 - c) Tie breakers that can connect redundant Class 1E buses (AC or DC) at one unit or that connect Class 1E buses between units at the same site.

Response

Generic Issue 48, regarding the vital AC buses and associated inverters, is not applicable to STP.

- Technical Specification 3/4.8.2 provides a specific limitation regarding the length of time a Class 1E distribution panel and associated inverter can be disconnected from its normal DC bus power supply. This time limitation is tied to the operability of the other Class 1E distribution panel trains.
- The Class 1E 120 Vital AC distribution panels utilize mechanically interlocked feeder breakers to ensure that the panels are connected to either the associated inverter or the standby voltage regulating transformer. The breakers utilize a "break-before-make" action to prevent transferring a fault from one source to another.

Generic Issue 49, regarding safety-related tie breakers between redundant safety trains, is also not applicable to STP. There are no tie breakers between any redundant safety-related trains of either STP unit or between the two STP units. The only tie breakers associated with safety-related equipment are located on the Class 1E 480 VAC load centers. However, these tie breakers connect each end of the load center associated with a single safety train only.

Element Status Cost Report

ITEM	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
EST. PERIOD COST	29952	30046	29902	30099	29902	30070	29877	30249	30095	27008	2844	10050	11751	119999
ACT. PERIOD COST	28901	24225	20523	23662	0	0	0	0	0	0	0	0	0	0
VARIANCE, \$	1050	5921	9380	6437	0	0	0	0	0	0	0	0	0	0
VARIANCE, %	3.5	19.7	31.4	21.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
EST. FY CUMUL	29952	59998	89900	119999	149901	179971	209848	240097	270192	297200	307045	317094	328845	
ACTUAL FY CUMUL	28901	53026	73549	97211	0	0	0	0	0	0	0	0	0	
PERCENT COMPLETE	9.88	0.161	0.224	0.295	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
VARIANCE, \$	1050	6971	16351	22788	0	0	0	0	0	0	0	0	0	
VARIANCE, %	3.5	11.6	18.2	19.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

9-19

NOTES:

- All Estimated actual costs exclude award fee.
- Estimates are based on November 1971 Operations Plan or Project Plan.
- TOTAL column reflects 10 total.

2. Procedures should require surveillances of these components.

Response

Since no component cross-ties exist, this item is not applicable.

3. Procedures should ensure that, except for the times covered in Item (1), the plant is operating in an electrical configuration consistent with the regulations and its design bases.

Response

No physical or electrical connections between redundant onsite Class 1E buses exist at STP. However, it is possible to cross-connect one ESF bus with one in the other Unit via the 138 KV Emergency Transformer. This would be performed under the emergency conditions posed by a station blackout event. The position of the supply breakers from the Emergency Transformer to the ESF buses is verified per procedure (ESF Power Availability).

Plant procedures have been established to ensure that changes in equipment configuration affecting the design basis of the plant are reviewed in accordance with 10CFR50.59.

3704-020 Thermo

