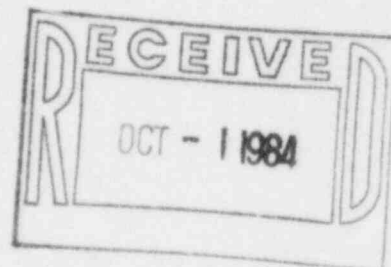


The Light company

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

September 25, 1984
ST-HL-AE-1131
File Number: G12.204

Mr. John T. Collins
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012



Dear Mr. Collins:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Supplement to the Final Report Concerning
Snubber Assembly Rear Brackets

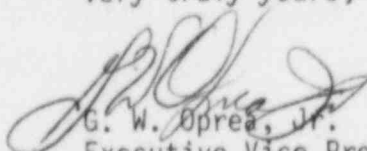
On July 6, 1984, pursuant to 10CFR50.55(e), Houston Lighting & Power Company (HL&P), notified your office of an item concerning rear brackets for snubbers supplied by Nuclear Power Services, Inc. (NPSI). By letter dated August 3, 1984 (reference ST-HL-AE-1118), HL&P submitted the final 10CFR50.55(e) report which identified that a forged rear bracket rather than a machined rear bracket was supplied by NPSI. The forged rear bracket is not an acceptable substitute due to interferences which will occur in angular applications of the snubber. The potential exists that snubbers which move into the area of interference may be rendered inoperable due to damage or binding at the snubber rear bracket thus preventing the snubber from performing its intended function.

Subsequent to the submittal of our final report, HL&P completed an evaluation of this issue as required by 10CFR21. We have determined that this item would have been reportable pursuant to 10CFR21 had it not been previously reported under 10CFR50.55(e). As illustrated by the enclosed correspondence from NPSI to Bechtel, our position is contrary to that of NPSI. The NRC Region IV (Jons Jaudon) was verbally notified by our Mr. M. E. Powell of this item on September 5, 1984. We do not know what other facilities may be affected. Other pertinent information required by 10CFR21 is contained in our 10CFR50.55(e) report.

If you should have any questions concerning this item, please contact Mr. Michael E. Powell at (713) 993-1328.

Very truly yours,

8410150258 840925
PDR ADOCK 05000498
S PDR


G. W. Oprea, Jr.
Executive Vice President

EE-27

MEP/mg
Attachment: Letter ST-NI-Y-1580 from NPSI to Bechtel

W2/NRC1/m

cc:

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

John T. Collins
Regional Administrator, Region IV
Nuclear Regulatory Commission
511 Ryan Plaza Drive, Suite 1000
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Victor Nerses, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20016

D. P. Tomlinson
Resident Inspector/South Texas Project
c/o U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

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Baker & Botts
One Shell Plaza
Houston, TX 77002

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1025 Connecticut Avenue, N.W.
Washington, DC 20036

Director, Office of Inspection
and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

H. L. Peterson/G. Pokorny
City of Austin
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Austin, TX 78767

J. B. Poston/A. vonRosenberg
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

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Assistant Attorney General for
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Hearing Attorney
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
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Charles Bechhoefer, Esquire
Chairman, Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. James C. Lamb, III
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Chapel Hill, NC 27514

Judge Ernest E. Hill
Hill Associates
210 Montego Drive
Danville, CA 94526

William S. Jordan, III, Esquire
Harmon, Weiss and Jordan
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Suite 430
Washington, DC 20009

Citizens for Equitable Utilities, Inc.
c/o Ms. Peggy Buchorn
Route 1, Box 1684
Brazoria, Texas 77422

Revised 08/10/84



nps industries, inc.

c/o Bechtel Energy Corporation
P.O. Box 2166
Houston, Texas 77252-2166
(713) 235-3666

ST-NI-YB-0680
August 17, 1984

Bechtel Energy Corporation
P O Box 2166
Houston, Texas 77252-2166

Reference: STP P.O. 35-1197-6017 ASME III and ANSI B31.1 Pipe Supports
Bechtel Job Number 14926-001

Subject: NPSI Response to Bechtel Letter ST-YB-NI-0318, dated August 7, 1984

Attention: Mr. R. L. Rogers - Project Engineering Manager

Attached, please find NPSI internal memo NJ-01-4394, dated August 17, 1984, which addresses Bechtel's concern regarding version "B" rear brackets with snubber assemblies, transmitted via Bechtel letter ST-YB-NI-0315, dated July 23, 1984.

This memo should further explain NPSI's position regarding evaluation and reportability in regards to 10CFR21 requirements.

Should you have any questions, please feel free to contact the writer at Ext. 3666.

Very truly yours,
NPS INDUSTRIES, INC.

Richard C. Moreau
STP Project Manager

:cfk

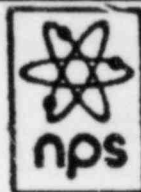
Attachment

cc: M. Samee, Bechtel, w/a
T. Manzo, Bechtel, w/a
L. Hovi, NPSI, w/a
W. Roera, NPSI, w/a
ST-NI-YB File, w/a

Inter-office memo

To: R. Moreau

WJ-01-4394



Date 8/17/84	Subject FORGED vs MACHINED BRACKETS	From Leo Novi
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My previous memo of July 18, 1984, intended to explain our reporting position on these brackets, is stated by Bechtel to be "not adequate".

This memo is to state in detail our position and the basis for that position.

NPSI's responsibilities and activities as regards 10CFR21 requirements are established in our Procedure NPSI/MRC-01. This procedure covers in detail the steps to be taken from the identification of a deviation, evaluating and reporting as a deviation, or evaluating and reporting as a defect.

For a condition to be evaluated under this procedure, it must be first determined to be a deviation. Guidance for this is included in Exhibit IV of our Procedure. If there is no deviation, there is no action under our Procedure to evaluate the condition for reportability. In this instance, a determination was made that a deviation as defined in Part 21 and in our Procedure does not exist. It is therefore not reportable by NPSI and does not warrant a formal evaluation by NPSI as to its reportability.

You may forward this memo to Bechtel in response to their ST-YB-WI-0318.

Leo Novi

LE:rmg

cc: P. Galus
T. O'Connell

RECEIVED NPSI - Houston

AUG 17 1984