

The Light company

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

March 1, 1985
ST-HL-AE-1200
File Number: G19

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Request for Amendment of Construction
Permit Nos. CPPR-128 & CPPR-129

- Reference:
- (1) Letter from J. H. Goldberg (HL&P) to H. R. Denton (NRC) dated September 28, 1983 (ST-HL-AE-1010)
 - (2) Letter from J. H. Goldberg (HL&P) to H. R. Denton (NRC) dated July 17, 1984 (ST-HL-AE-1096)

Dear Mr. Denton:

On September 28, 1983 Houston Lighting and Power Company (HL&P) filed a request and provided justification for the application of alternative pipe break design criteria on the South Texas Project (STP) Units 1 and 2. Specifically, HL&P requested NRC approval of the elimination of postulated longitudinal and circumferential breaks in the reactor coolant system (RCS) main loop piping and associated dynamic effects from design consideration. (Reference 1).

Subsequent to HL&P's September 28, 1983 request, the NRC issued Generic Letter 84-04, which concluded that the generic Westinghouse fracture mechanics analysis could provide an acceptable basis for the elimination of discrete RCS main loop pipe breaks and associated asymmetric blowdown loads. It also concluded that this generic work, in conjunction with plant specific analyses, could provide an adequate basis for the application of alternative pipe break criteria to Westinghouse PWRs, such as STP. Generic Letter 84-04 indicated that in order to obtain NRC approval of a proposed application of alternative pipe break criteria it would be necessary to request an exemption to 10 CFR Part 50, Appendix A, General Design Criterion 4 (GDC-4).

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In accordance with that guidance, by letter of July 17, 1984, HL&P applied for an exemption, pursuant to 10 CFR Section 50.12(a), from certain provisions of GDC-4 for STP, Units 1 and 2. (Reference 2). HL&P specifically requested the elimination of postulated circumferential and longitudinal breaks in the RCS main loop piping and the associated dynamic effects from consideration in the structural design basis of STP.

Since Generic Letter 84-04 was issued, informal discussions with NRR staff have indicated that effectuation of the alternative pipe break criteria should also require amendments to the construction permits. Such amendments have been requested by other utilities seeking an exemption from GDC-4, and at least one amendment has been granted by the NRC.

Accordingly, HL&P as Project Manager for STP, acting for itself and for the City of San Antonio (acting by and through the City Public Service Board of San Antonio), Central Power and Light Company, and the City of Austin, Texas, hereby requests that Construction Permits Nos. CPPR-128 and CPPR-129 be amended to permit elimination of postulated circumferential and longitudinal breaks in the RCS main loop piping and the associated dynamic effects from consideration in the structural design basis of STP.

The information supporting the requested amendments is contained in Reference 1 and Reference 2, which are hereby incorporated by reference in this application.

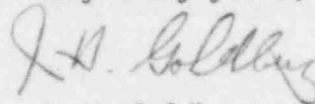
The requested amendments are not inimical to the common defense and security or to the health and safety of the public and do not involve a significant hazards consideration.

Attached is an affidavit in accordance with 10 CFR Section 50.30.

Enclosed in accordance with 10 CFR Section 170.12 is a check in the amount of \$300.00 in payment of the application fees associated with the request for amendments of the two construction permits.

Your prompt and favorable action on this request will be appreciated.

Very truly yours,



J. H. Goldberg
Group Vice President, Nuclear

MEP/yd

Attachments

W2/NRC2/f

cc:

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Washington, DC 20555

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

South Texas Project
Units 1 and 2

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Docket Nos. 50-498
50-499

AFFIDAVIT

J. H. Goldberg, being first duly sworn, deposes and says: That he is Group Vice President, Nuclear of HOUSTON LIGHTING & POWER COMPANY, Project Manager of the South Texas Project and an Applicant herein; that the foregoing request for amendments of Construction Permits Nos. CPPR-128 and CPPR-129, to permit elimination of postulated circumferential and longitudinal breaks in the reactor coolant system main loop piping and the associated dynamic effects from consideration in the structural design basis of the South Texas Project has been prepared under his supervision and direction; that he knows the contents thereof; and that to the best of his knowledge and belief said request and the facts contained therein are true and correct.

DATED: This 1st day of MARCH, 1985.

Signed: _____

J. H. Goldberg
J. H. Goldberg
Group Vice President, Nuclear

STATE OF TEXAS

COUNTY OF HARRIS

Subscribed and sworn to before me, a Notary Public in and
for Harris County, Texas this 1 day of MARCH, 1985.

Angelina K. Self
Notary Public
State of Texas

My commission expires:

2/17/89