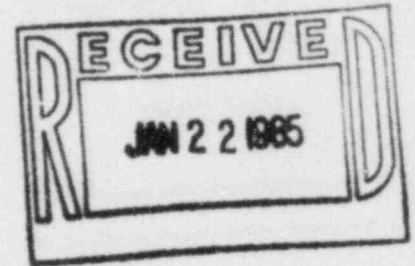


The Light company

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January 18, 1984
ST-HL-AE-1172
File No.: G12.223

Mr. Robert D Martin
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Dear Mr. Martin:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Flood Protection Deficiency

On December 20, 1984 HL&P notified the Nuclear Regulatory Commission concerning a reportable deficiency related to inadequate flood protection of Category I structures. Please find attached the first interim report on this deficiency. This report identifies the corrective action to be initiated for each deficiency. In addition, a comprehensive review program is underway to identify and correct any other flood protection problems.

The next report will be submitted by April 15, 1985. If there are any questions please contact Mr. Michael E. Powell at (713)993-1328.

Very truly yours,

G. W. Oprea, Jr.
G. W. Oprea, Jr.
Executive Vice President

SMH/ch

Attachment: Flood Protection Deficiency

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U.S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Flood Protection Deficiency

I. Summary

A review of flood protection measures for Category I structures resulted in the determination that certain exterior openings are not adequately protected against external floods. This violates the requirements of 10CFR50 Appendix A General Design Criteria 2 and if left uncorrected could have adversely affected the safety of the plant.

Design changes are being implemented to correct the identified deficiencies. In addition, a comprehensive review is underway to identify and correct any other flood protection related problems.

II. Description of the Deficiency

On December 20, 1984 HL&P notified the Nuclear Regulatory Commission of a reportable deficiency concerning inadequate flood protection of Category I structures. The specific deficiencies identified were discovered during a survey in preparation of responses to NRC questions on flood protection. The specific deficiencies are as follows:

- A. The cover for the top of the Tendon Gallery (TG) shaft is not watertight. Although flooding of the TG is not a concern a non watertight access door exists between the TG and the Mechanical Electrical Auxiliary Building (MEAB). Flooding of the TG would, therefore, ultimately result in the flooding of the MEAB.
- B. Two drain systems with external discharge capability do not have check valves on their discharge lines; specifically, one 4" sanitary sewer line out of the MEAB (see Drawing 9-B-0154) and three 8" oily waste/fire drain system lines out of the diesel generator building (see Drawing 9-B-0171).
- C. Ductbanks leaving the MEAB at various elevations below grade terminate at manholes which are not provided with watertight covers. The ducts provide a path for flood waters as the space around the cables is not plugged by watertight seals (see Drawings O-C-5041, 9-C-4063, and O-C-5033).

III. Corrective Action

Corrective action to correct the above deficiencies are as follows:

- A. Flooding of the MEAB will be prevented by installation of a watertight door at the bottom of the tendon gallery access shaft.
- B. Check valves will be provided on the four lines found not to have backflow prevention devices.

C. All ductbanks leading into safety-related areas will be sealed.

Revisions to required design drawings will be completed by March 15, 1985.

IV. Recurrence Control

A review of Seismic Category I buildings will be performed to verify that all external openings below design basis flood water levels are designed to prevent migration of water into safety-related areas. Included in this review will be an evaluation of the adequacy of any waterstops installed between adjacent Seismic Category I buildings to prevent inleakage of water through exterior walls via piping penetrations. Results of this review and identification of design fixes to correct deficiencies will be completed by April 15, 1985.

V. Safety Analysis

Extensive modeling and analysis of deficiency A is necessary to assess potential impact on safety-related areas. This modeling was deemed not to be cost effective and the design fix identified in III above will be implemented to preclude any adverse impact. The presence of deficiencies B and C, if left uncorrected, could impact safety-related areas.