The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

October 29, 1996 ST-HL-AE-5488 File No.: G03.03 10 CFR 50

U. S. Nuclear Regulatory CommissionAttention: Document Control DeskWashington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Resolution of NRC Bulletin 88-08,
"Thermal Stresses in Piping Connected to Reactor Coolant Systems"

- Reference: 1. Letter from T. W. Alexion, NRC to W. T. Cottle, Houston Lighting and Power, "Resolution of Bulletin 88-08, "Thermal Stresses in Piping Connected to Reactor Coolant Systems", South Texas Project, Units 1 and 2 (STP) (TAC NOS. M93833 and M93823)," dated February 23, 1996
  - Letter from S. E. Thomas, Houston Lighting and Power, to the NRC Document Control Desk, dated July 15, 1996 (ST-HL-AE-5418)
  - Letter from L.E. Kokajko, NRC to W. T. Cottle, Houston Lighting and Power, "Resolution of NRC Bulletin 88-08, "Thermal Stresses in Piping Connected to Reactor Coolant Systems," For South Texas Project, Units 1 and 2 (TAC NOS. M69689 and M69690)," dated April 11, 1994
  - Letter from T. H. Cloninger, Houston Lighting and Power, to the NRC Document Control Desk, dated November 30, 1993 (ST-HL-AE-4639)

In reference 3, the NRC staff concluded, based on the reviewed results of the South Texas Project's (STP) response, reference 4, that the integrity of the piping subject to Bulletin 88-08 is ensured for near-term operation, ten years. Based on the technical details of this issue, STP interprets the ten years of operation as ten years at Normal Operating Temperature (NOT) and Normal Operating Pressure (NOP) when the systems are actually potentially susceptible to stratification. Therefore, STP has determined that this will need to be resolved by the 1999 to 2000 time frame. Based on a telephone conversation between Mr. T. W. Alexion of the NRC staff and Mr. A. W. Harrison of STP on September 11, 1996, we understand that the NRC concurs with this STP interpretation.

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STP's analysis supports our position that the integrity of the subject piping is ensured for the remaining life of the plant. Furthermore, normal 10 year inservice inspections (ISI) at selected location on the unisolable RCS piping are sufficient to validate that integrity without the necessity of installing instrumentation. STP requests a meeting before January, 1997 in order to resolve any open NRC issues and close this issue.

If you should have any questions concerning this matter, please contact Mr. H. R. Pate at (512) 972-7787 or me at (512) 972-7162.

S.E. Thomas

Manager,

Design Engineering

HRP/lf

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