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U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 205455

> South Texas Project Units 1 and 2 Docket Nos. STN 50-498, STN 50-499 AMSAC Diversity

REFERENCES: A. Additional information concerning AMSAC, M. R. Wisenburg, HL&P Letter to the NRC; December 22, 1987; ST-HL-AE-2444.

> B. Acceptance for Referencing of Licensing Topica! Report. Charles E. Rossi, NRC Letter to L. D. Butterfield, WOG; July 7, 1986.

Reference A provided additional information requested by the NRC staff to support review of South Texas Project's AMSAC submittal (FSAR Section 7.8). Subsequent staff review raised additional questions concerning diversity between the Reactor Trip System and AMSAC, as implemented at STP. Specific NRC staff concerns related to (1) the microprocessors used in AMSAC and in the Steam Generator Water Level Compensation System (SGWLCS) portion of the Reactor Trip System (RTS), and (2) the isolation relays used in the actuation circuits. Additional information which is expected to be sufficient to resolve these diversity issues is provided in the Attachments.

FSAR Figure 7.8-2, Composite AMSAC Logic Diagram, which was requested by the NRC staff and provided in draft form by reference A, has been modified to better show the output actuation logic. Copies are provided as Attachment 3.

If you should have any questions on this matter, please contact Mr. A. W. Harrison at (512) 972-7298.

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Attachments: 1. AMSAC/SGWLCS Microprocessor Diversity 2. AMSAC/RTS Isolation Device Diversity 3. Composite AMSAC Logic Diagram, FSAR Figure 7.8-2

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## AMSAC/SGVLCS MICROPROCESSOR DIVERSITY

STP FSAR Section 7.8.1.1.7 indicated that "some microprocessor boards" are common in both AMSAC and SGWLGG. There are actually several Microprocessors in each system. An Intel SBC 8614 board containing an Intel 8086 CPU is utilized for each of the three Actuation Logic Processors (ALP) in AMSAC. As the name would imply, the ALPs are the main processors and they generate the actuation signals. SGWLCS utilizes an Intel SBC 8840 board containing an Intel 8088 CPU as its main processor for Steam Generator water level signals. In acdition to the hardware differences, the software for those two systems was developed separately, and is different.

Those Microprocessor Boards which are common between the two systems are peripheral boards which are utilized for tasting. There is no potential for common mode failure; operation of these microprocessors does not affect the ability of the main CPUs to perform their actuation signal processing functions.

Therefore, we believe that diversity to the extent reasonable and practical to minimize the potential for common cause failures has been provided as required by the safety evaluation of Reference B.

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## AMSAC/RTS ISOLATION DEVICE DIVERSITY

Potter and Brumfield MDR Relays are used as isolation devices between AMSAC and the Reactor Trip System (RTS) and Engineered Safeguards Features Actuation System (ESFAS) as discussed in FSAR Section 7.8.1.1.6.

These relays have a large installed industrial base with a long history of demonstrated reliability. This reliability includes both circuit operability and maintenance of the isolation barrier. MDR relays have been utilized in many nuclear power plants as isolation devices and have been previously accepted by the NRC staff for this application at STP.

The safety evaluation of Reference B recognizes that the probabilities of RTS unavailability with AMSAC availability are similar with or without addition of diverse isolators. With the addition of a diverse isolator, the probability of not getting a reactor trip signal or AMSAC signal would be increased somewhat by the failure rate of the diverse isolator. For these reasons, use of existing isolators is deemed acceptable. The acceptability of these isolators is stated in the plant specific information section of the safety evaluation under "Electrical independence from existing reactor protection system" (pg. 15).

It should also be noted that MDR relays are used as isolation devices in the ESFAS but not the RTS. That is, MDR relays exist in the signal path to actuate Auxiliary Feedwater (AFW) through either AMSAC or ESFAS, but they do not exist in the RTS signal path to trip the reactor. Should a common mode failure of MDR relays be postulated during an event, the reactor trip would function and no Anticipated Transient Without Scram (ATWS) would occur; therefore, AMSAC would not be required to function.

We believe that, in the case of isolation devices, diversity to the extent reasonable and practical to minimize the potential for common cause failures has been provided as required by the safety evaluation of Reference B.







