

# The Light company

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March 7, 1986  
ST-HL-AE-1618  
File No.: G9.10 & C1.1

Mr. Vincent S. Noonan, Project Director  
PWR Project Directorate #5  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Exemption Request to GDC-4

- Reference:
- 1) Letter from J. H. Goldberg to H. R. Denton, dated September 28, 1983 (ST-HL-AE-1010)
  - 2) Letter from J. H. Goldberg to H. R. Denton, dated July 17, 1984 (ST-HL-AE-1096)
  - 3) Letter from J. H. Goldberg to H. R. Denton, dated March 1, 1985 (ST-HL-AE-1200)
  - 4) Letter from J. H. Goldberg to H. R. Denton, dated August 19, 1985 (ST-HL-AE-1326)
  - 5) Letter from M. R. Wisenburg to V. S. Noonan, dated January 13, 1986 (ST-HL-AE-1577)

Dear Mr. Noonan:

In a submittal dated September 28, 1983, (Ref. 1) HL&P enclosed Westinghouse Report WCAP-10559 containing the technical basis for our request to eliminate the postulated breaks in the reactor coolant system RCS piping of the South Texas Project Units 1 and 2. We further stated in References 2-4 that eliminating these postulated breaks would result in eliminating their associated dynamic effects which are specifically defined as the effects of missiles, pipe whipping, subcompartment pressurization, and fluid jets. We stated that granting this request (1) eliminates the need to postulate longitudinal and circumferential pipe breaks in the RCS primary piping (hot leg, cold leg, and crossover leg piping); and 2) eliminates the requirement to analyze and design for the following dynamic effects of these breaks: jet impingement, blowdown loads, pipe whip, reactor cavity pressurization, asymmetric pressurization transients (USI A-2), subcompartment pressurization transients and load combination assumptions. The exemption request does not apply to the containment design basis, the emergency core cooling system, environmental qualification, engineered safety features systems response, or the design of the RCS heavy component supports.

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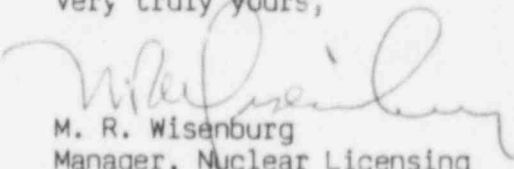
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Reference 4 included our application for a Construction Permit Amendment and a schedular exemption from the requirements of 10CFR50, Appendix A General Design Criterion 4 which, among other things, would authorize the removal of the pipe whip restraints on the RCS main loop and cross-over piping until such time as the Commission's proposed rule "Limited Scope Modification to GDC-4 Requirements for Protection Against Postulated Pipe Ruptures" (50 F.R. 27006) is made final or until the second refueling outage of each unit, which ever occurs first.

Since we are confident that either the Commission will issue a final rule or our exemption request will be approved prior to fuel loading of Unit 1, we are taking action at this time to remove the pipe whip restraints on the RCS and main loop piping where these restraints interfere with ongoing construction work. Restraints will also be removed if it is determined that removal involves less expense than abandonment.

Should you have any questions regarding this matter please get in touch with me at (713) 993-1330.

Very truly yours,

  
M. R. Wisenburg  
Manager, Nuclear Licensing

MRW/yd

Houston Lighting & Power Company

cc:

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