

# The Light company

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April 17, 1986  
ST-HL-AE-1636  
File No.: G9.15

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

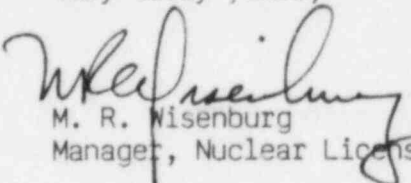
South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Response to NUREG 0737 Items II.k.1.5, II.k.1.10, II.k.1.17

Dear Mr. Noonan:

Attached are responses to NUREG 0737 items II.k.1.5, II.k.1.10 and II.k.1.17 for the South Texas Project Electric Generating Station. These responses will be included in FSAR Section 7A in a future amendment.

If you should have any questions on this matter, please contact Mr. M. E. Powell at (713) 993-1328.

Very truly yours,

  
M. R. Wisenburg  
Manager, Nuclear Licensing

MAM/ljm

Attachments: (3)

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Houston Lighting & Power Company

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Revised 12/2/85

II.k.1.5

NRC Position

Review all safety-related valve positions, positioning requirements and positive controls to assure that valves remain positioned (open or closed) in a manner to ensure the proper operation of engineered safety features. Also review related procedures, such as those for maintenance, testing, plant and system startup, and supervisory periodic (e.g., daily/shift checks,) surveillance to ensure that such valves are returned to their correct positions following necessary manipulations and are maintained in their proper positions during all operational modes.

Response

Safety related valve positions, positioning requirements and controls have been reviewed to assure that valves remain in their correct positions for ESF operation. Plant procedures provide the necessary verifications to ensure that valves are maintained in their correct positions during all operational modes.

II.k.1.10

NRC Position

Review and modify as necessary your maintenance and test procedures to ensure that they require:

- a. Verification, by test or inspection, of the operability of redundant safety-related systems prior to the removal of any safety-related system from service.
- b. Verification of the operability of all safety-related systems when they are returned to service following maintenance or testing.
- c. Explicit notification of involved reactor operational personnel whenever a safety-related system is removed from and returned to service.

Response

- a. Procedures require verification that redundant safety-related components are available prior to the removal from service of any safety-related component.
- b. Procedures require verification of the operability of safety-related systems when they are returned to service following maintenance or testing.
- c. Procedures require notification of appropriate operational personnel when a safety-related system is removed from or returned to service.

II.k.1.17

NRC Position

For your facilities that use pressurizer water level coincident with pressurizer pressure for automatic initiation of safety injection into the reactor coolant system, trip the low pressurizer level set point bistables such that, when the pressurizer pressure reaches the low set point, safety injection would be initiated regardless of the pressurizer level. In addition, instruct operators to manually initiate safety injection when the pressurizer pressure indication reaches the actuation set point whether or not the level indication has dropped to the actuation set point.

Response

The STP design does not include the pressurizer water level coincident with pressurizer pressure trip.