

The Light company

Houston Lighting & Power

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December 2, 1988
ST-HL-AE-2888
File No.: G3.3
10CFR50

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Docket No. 50-499

NRC Bulletin No. 88-10: "Nonconforming Molded - Case Circuit Breakers"
HL&P Proposal to Extend Completion Time
for South Texas Project Electric Generating Station, Unit 2

HL&P received NRC Bulletin 88-10 on November 23, 1988. The South Texas Project Electric Generating Station (STPEGS) is aggressively pursuing the actions required by the Bulletin. However, due to the magnitude and complexity of the task, it is not clear that HL&P can complete all actions required prior to fuel load in Unit 2.

We believe that the prerequisite test required for our installed Class 1E molded case circuit breakers provides substantial confidence in their safety and reliability. Our prerequisite tests are conducted as part of our startup test program and are described in Attachment A.

There are currently two sources of stored Class 1E molded case circuit breakers at STPEGS, those procured as operations spares by HL&P and those remaining from the construction phase in Bechtel warehouse control.

HL&P has identified 118 Class 1E and commercial grade dedicated molded case circuit breakers in stock. Of the 118, our reviews of the procurement records have found 9 breakers for which we have on site evidence of traceability to the circuit breaker manufacturer (CBM), 57 for which we have obtained documentation from the equipment supplier that indicates that he has verifiable traceability to the CBM, and 52 for which we are still in the process of contacting the equipment vendors.

Bechtel to date has identified 854 Class 1E molded case circuit breakers remaining in the warehouse from the construction phase. Of the 854, our reviews of site records on the first 189 have identified that all 189 are traceable to only the original electrical equipment manufacturer (OEM) not the CBM. Contacts are being made with the OEMs to obtain evidence of CBM traceability.

A subsidiary of Houston Industries Incorporated

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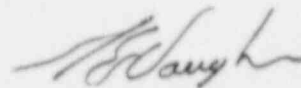
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Although the warehouse inventory verifications and site documentation reviews will be complete prior to fuel load, the traceability verification will be dependent on equipment supplier cooperation for a very high percentage of the breakers. We cannot judge at this time how long it will take to obtain the required information from the many vendors involved.

Based on these considerations, HL&P plans to submit the results of our evaluation for STPEGS Units 1 & 2 by April 1, 1989.

If you have any questions, please contact J. N. Bailey at (512) 972-8663 or T. J. Jordan at (512) 972-7902.



G. E. Vaughn
Vice President,
Nuclear Operations

JHG/TJJ:mg

Attachment A

cc:

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Houston Lighting & Power Company

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

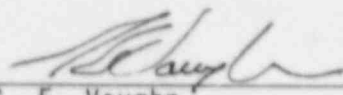
South Texas Project
Unit 2

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Docket No. 50-499

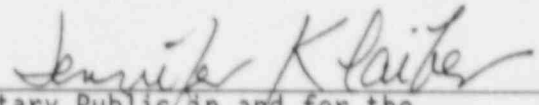
AFFIDAVIT

G. E. Vaughn being duly sworn, hereby deposes and says that is is Vice President, Nuclear Plant Operations of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to NRC Bulletin 88-10; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.



G. E. Vaughn
Vice President, Nuclear Plant Operations

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 2nd day of December, 1988.



Notary Public in and for the
State of Texas

ATTACHMENT A

Circuit Breakers (CBs) used in Class 1F applications at South Texas Project Electric Generating Station (STPEGS) are required to be tested in accordance with General Prerequisite Test Procedure SG-E-01, Plant Maintenance Procedure OPMP05-NA-0004, or Plant Station Procedure 1PSP06-NZ-0006. The requirements of these procedures are as follows:

SG-E-01

1. Inspect for cleanliness and any physical defects. Ensure load and line side connections are tight.
2. Functionally test mechanical interlocks for proper operation.
3. Open and close breaker 3 times.
4. Verify with OHM meter that contacts are open and closed when indicated as such by switch handle position.
5. Insulation Resistance Test.
6. Test thermal trip function by applying a current 300% of the breaker rating. Measure trip time for each phase.
7. For magnetic breakers, test each pole by applying an increasing current until breaker trips.

OPMP05-NA-0004, 1PSP06-NZ-0006

1. Inspect breaker for physical damage or evidence of overheating.
2. Open and close breaker a minimum of 3 times to check mechanical operation.
3. Continuity check on each pole with breaker closed.
4. Insulation Resistance Test.
5. Test the molded case breakers by primary injection.
 - A. Instantaneous Trip Test. Apply increasing current until breaker trips.
 - B. Overcurrent Trip Test on thermal breakers at 300% of breaker rating. Measure trip time for each phase.

CBs tested to the requirements of these procedures have been shown to be functional and operable. CBs which have been tested to the above requirements are considered reliable and give reasonable assurance that the performance of these CBs will be acceptable until completion of the requirements of NRC Bulletin 88-10.