

The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

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10CFR50.57

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

South Texas Project
Unit 1

Docket No. STN 50-498

Request for Exemption of Criticality Monitors Under 10CFR Part 50

On December 29, 1986, Houston Lighting & Power Company (HL&P) was granted Materials License No. SNM-1972 which authorized the receipt, possession, inspection, and storage of uranium enriched in the U-235 isotope contained in fuel assemblies. The fuel assemblies are for eventual use at the South Texas Project Electric Generating Station - Unit 1. The license contained an exemption from the provisions of 10CFR70.24 as authorized by 10CFR70.14. This exemption relieved HL&P from the requirement of having a criticality alarm system.

As stated in SNM-1972, the expiration of the license is November 30, 1991, or upon conversion of construction permit CFP-128 to an operating license, whichever is earlier. Upon conversion to an operating license, the provisions and exemptions granted under 10CFR70.24 and the SNM-1972 license are no longer applicable. Accordingly, HL&P requests that the exemption granted under 10CFR70.24 be used as the bases for a similar exemption under the 10CFR Part 50 operating license based upon the following justification.

The fuel storage racks provide physical protection to ensure subcriticality. All fuel handling activities will follow approved fuel handling procedures. When fuel assemblies are removed from storage, no more than two will be allowed out of storage at one time. Conditions that could lead to accidental criticality will be avoided by having the fuel assemblies that are out of approved storage locations in physically separate areas. Single fuel assemblies may be out of storage in the new fuel handling area/new fuel storage pit/new fuel inspection laydown area and in the new fuel elevator/transfer canal/spent fuel pool. This arrangement will ensure that a subcritical configuration is maintained at all times.

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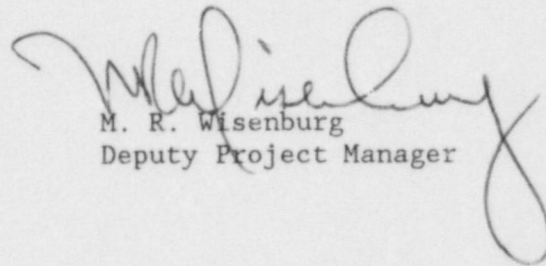
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These procedural controls provide reasonable assurance that nuclear criticality will not occur during fuel handling and monitoring is not needed. Even if the procedural controls were violated, optimum conditions of neutron moderation, physical spacing, and neutron reflection would be required for assemblies to be in a critical situation.

In conclusion, HL&P respectfully requests that the exemption granted under 10CFR Part 70.24 in SNM-1972 also be granted under the provisions of 10CFR Part 50.57, "Operating License". This request is being made to allow deletion of the criticality monitors in Tables 3.3-6 and 4.3-4 of the South Texas Project Unit 1 Technical Specifications as required by 10CFR50.36.

If you should have any questions on this matter, please contact Ms. Frostie A. White at (512) 972-7985.


M. R. Wisenburg
Deputy Project Manager

FAW/ljm

cc:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

N. Prasad Kadambi, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Robert L. Perch, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Dan R. Carpenter
Senior Resident Inspector/Operations
c/o U.S. Nuclear Regulatory
Commission
P.O. Box 910
Bay City, TX 77414

Claude E. Johnson
Senior Resident Inspector/STP
c/o U.S. Nuclear Regulatory
Commission
P.O. Box 910
Bay City, TX 77414

M.D. Schwarz, Jr., Esquire
Baker & Botts
One Shell Plaza
Houston, TX 77002

J.R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

T.V. Shockley/R.L. Range
Central Power & Light Company
P. O. Box 2121
Corpus Christi, TX 78403

M.B. Lee/J.E. Malaski
City of Austin
P.O. Box 1088
Austin, TX 78767-8814

M.T. Hardt/A. von Rosenberg
City Public Service Board
P.O. Box 1771
San Antonio, TX 78296

Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
1717 H Street
Washington, DC 20555