



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

50-498

August 21, 1997

Mr. William T. Cottle  
Executive Vice-President &  
General Manager, Nuclear  
Houston Lighting & Power Company  
South Texas Project Electric  
Generating Station  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: PROPOSED LICENSE AMENDMENT TO TECHNICAL SPECIFICATION TABLE 2.2-1  
AND 3/4.2.5 FOR REACTOR COOLANT SYSTEM (RCS) FLOW MONITORING, SOUTH  
TEXAS PROJECT, UNITS 1 AND 2 (TAC NOS. M99245 AND M99246)

Dear Mr. Cottle:

By letter dated July 16, 1997, as superseded by letter dated August 6, 1997, Houston Lighting & Power Company (HL&P) submitted the subject proposed license amendment. The proposed amendment would revise Technical Specification (TS) Table 2.2-1 and 3/4.2.5 to allow the RCS total flow to be determined using cold leg elbow tap differential pressure measurements in lieu of precision heat balance measurements. The letter requested Nuclear Regulatory Commission (NRC) approval prior to the next refueling outage for Unit 1, which is currently scheduled to begin September 13, 1997.

We have completed a preliminary review of the proposed license amendment. Due to the magnitude and complexity of the issues involved, we will most likely not be able to meet HL&P's September 13, 1997, date. Our estimate of the earliest target schedule the NRC staff could possibly meet for issuance of the license amendment would be the end of September 1997, which should be in time for Unit 1 restart. This schedule assumes that the staff doesn't identify any problems with the submittal that can't be resolved in time for Unit 1 restart.

The NRC has also determined that the submittal was not timely. In previous discussions between NRC and HL&P on this subject, we estimated that an application similar to what we had previously approved for Catawba would take about 3 months to review. We also stated that an application similar to what we are still reviewing for Farley would take at least 6 months to review. We have determined that HL&P's submittal has elements similar to both the Catawba and Farley submittals, and thus would require its own unique review. Since your proposal contains elements of the Farley submittal that have not yet been resolved, our estimated completion by the end of September 1997 could be affected by these issues. Since HL&P's letter states that a low margin to required RCS flow was first identified in early March 1997, and the NRC had previously informed HL&P on necessary lead times for staff review, we consider that the submittal was not timely to allow adequate staff review to support your requested schedule. We will make every effort to complete our review to support Unit 1 restart, subject to the acceptability of your proposal.

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William T. Cottle

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Also, we consider that your proposed TS 4.2.5.3 does not specify the methodology for measuring RCS total flow rate. We consider that the methodology approved by the staff needs to be specified in the TS to ensure staff-approved assumptions remain valid.

As a final note, in the event that HL&P's RCS flow monitoring application is not approved in time for Unit 1 restart, the staff recommends that HL&P consider submitting a separate application, as a contingency, that will allow Unit 1 to restart with a reduced RCS flow rate, as determined by the 18-month precision heat balance measurements.

If you have any questions, please contact Thomas Alexion at (301) 415-1326.

Sincerely,

ORIGINAL SIGNED BY:

James W. Clifford, Acting Director  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

cc: See next page

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Document Name: STP99245.LTR

\*See previous concurrence

OFC	PM/PD4-1	LA/PD4-1	(A)BC/SRXB*	(A)D/PD4-1	D/DRPW
NAME	TAlexion	CHawes CMH	JLyons	JClifford	JRoe
DATE	8/15/97	8/14/97	08/01/97	8/15/97	/97
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OFFICIAL RECORD COPY signed 8/21/97

William T. Cottle

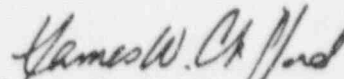
- 2 -

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James W. Clifford, Acting Director  
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Office of Nuclear Reactor Regulation

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cc: See next page

Mr. William T. Cottle  
Houston Lighting & Power Company

South Texas, Units 1 & 2

cc:

Mr. David P. Loveless  
Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 910  
Bay City, TX 77414

Jack R. Newman, Esq.  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, DC 20036-5869

Mr. J. C. Lanier/M. B. Lee  
City of Austin  
Electric Utility Department  
721 Barton Springs Road  
Austin, TX 78704

Mr. Lawrence E. Martin  
General Manager, Nuclear Assurance Licensing  
Houston Lighting and Power Company  
P. O. Box 289  
Wadsworth, TX 77483

Mr. M. T. Hardt  
Mr. W. C. Gunst  
City Public Service Board  
P. O. Box 1771  
San Antonio, TX 78296

Rufus S. Scott  
Associate General Counsel  
Houston Lighting and Power Company  
P. O. Box 61867  
Houston, TX 77208

Mr. G. E. Vaughn/C. A. Johnson  
Central Power and Light Company  
P. O. Box 289  
Mail Code: N5012  
Wadsworth, TX 74483

Joseph R. Egan, Esq.  
Egan & Associates, P.C.  
2300 N Street, N.W.  
Washington, DC 20037

INPO  
Records Center  
700 Galleria Parkway  
Atlanta, GA 30339-3064

Office of the Governor  
ATTN: Andy Barrett, Director  
Environmental Policy  
P. O. Box 12428  
Austin, TX 78711

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

Arthur C. Tate, Director  
Division of Compliance & Inspection  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78756

Dr. Bertram Wolfe  
15453 Via Vaquero  
Monte Sereno, CA 95030

Texas Public Utility Commission  
ATTN: Mr. Glenn W. Dishong  
7800 Shoal Creek Blvd.  
Suite 400N  
Austin, TX 78757-1024

Judge, Matagorda County  
Matagorda County Courthouse  
1700 Seventh Street  
Bay City, TX 77414