

The Light company

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

June 4, 1981
ST-HL-AE-681
SFN: C-0570

Mr. G. L. Madsen, Chief
Reactor Project Branch
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
RESPONSE TO NRC INSPECTION FINDINGS
DOCKET NOS. 50-498/81-10 AND 50-499/81-10

Dear Mr. Madsen:

The following is our response to the Notice of Violation relating to Inspection Report, Nos. 50-498/81-10 and 50-499/81-10 dated May 7, 1981, "Failure to Test for Air Content in Grout".

Based on a review of the applicable codes and standards including their current revisions, our specification requirements, and the function of grout to butter the slickline and as a slush coat at construction joints, we have reverified that in-process testing of air-content in this type of grout is not a requirement and accordingly failure to perform periodic air content tests does not constitute a "violation" and does not in itself degrade the confidence level of the grout quality.

We wish to clarify this position as follows:

1. Applicable codes and standards do not require testing of air content of such grout. There is, however, a requirement that the proportions of materials shall be based upon trial mixes using the same type and brand of cement, fine aggregate and admixtures as will be used for construction. This requirement is complied with.
2. The Project Specifications do not require a specific testing frequency for air content of this grout nor did the mix approval referenced in the inspection report, and in fact the mix approval did not require that the air content "not exceed 10 percent."

8107280567 810624
PDR ADOCK 05000498
Q PDR

The statement concerning the A-0-3-15 grout that, "design air content of 10% should not be exceeded" was intended to assist the concrete supplier in adjusting the dosage rates of air entraining admixture giving due consideration to such items as ambient conditions, sand fineness modulus and cement content. It was not intended to be a technical requirement for in-process control. Based upon the Engineering and QC review of batch plant records and the results of periodic compressive strength tests, we have confirmed that the intent of the "Note" was complied with and that quality grout was being batched.

3. The application of grout on the construction joint facilitates bonding and consolidation of the first layer of concrete placed on the joint, in addition to lubricating the slickline prior to pumping of concrete. The design requirements for grout of this type are met by complying with Item 1 above and requiring strict control over the water/cement ratio and batching procedures. Such controls are adequately provided at STP. In addition, grout of this type becomes intermixed when subsequent layers of concrete are placed resulting in essentially a homogeneous distribution, and since the grout mix is proportioned to have a water/cement (w/c) ratio similar to or lower than the concrete w/c ratio, uniformity and conservatism is maintained.

The reference to air content for grout mix No. A-0-3-15 has been clarified on the current mix approval list to instruct the concrete supplier to batch admixtures at dosage rates similar to the concrete being batched for that day.

In summary, Houston Lighting & Power is of the opinion that sufficient controls commensurate with the safety significance of this material, including its use, do exist and have existed in the past. These controls have assured that the material incorporated into the safety-related structures have the required quality.

I. CORRECTIVE STEPS

Based upon the above clarification, this is not required.

II. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

None required.

June 4, 1981
ST-HL-AE-681
SFN: C-0570
Page 3

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

None required.

Very truly yours,

J. H. Goldberg for

G. W. Oprea, Jr.
Executive Vice President

HGO/amj
Attachments

Houston Lighting & Power Company

cc: J. H. Goldberg
D. G. Barker
C. G. Robertson
Howard Pyle
R. L. Waldrop
H. R. Dean
D. R. Beeth
J. D. Parsons
L. K. English
J. W. Briskin
R. A. Frazar
STP RMS

H. S. Phillips (NRC)
J. O. Read (Read-Poland, Inc.)
M. D. Schwarz (Baker & Botts)
R. Gordon Gooch (Baker & Botts)
J. R. Newman (Lowenstein, Newman, Reis, & Axelrad)
Director, Office of Inspection & Enforcement
Nuclear Regulatory Commission
Washington, D. C. 20555

June 4, 1981
ST-HL-AE-681
SFN: C-0570
Page 4

M. L. Borchelt
President
Central Power & Light Company
P. O. Box 2121
Corpus Christi, Texas 78403

Charles Bechhoefer, Esquire
Chairman, Atomic Safety & Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

R. L. Range
Central Power & Light
P. O. Box 2121
Corpus Christi, Texas 78403

Dr. James C. Lamb, III
313 Woodhaven Road
Chapel Hill, North Carolina 27514

R. L. Hancock
Director of Electrical Utilities
City of Austin
P. O. Box 1088
Austin, Texas 78767

Mr. Ernest E. Hill
Lawrence Livermore Laboratory
University of California
P. O. Box 808, L-123
Livermore, California 94550

T. H. Muehlenbeck
City of Austin
P. O. Box 1088
Austin, Texas 78767

William S. Jordan, III
Harmon & Weiss
1725 I Street, N. W.
Suite 506
Washington, D. C. 20006

J. B. Poston
Assistant General Manager of Operations
City Public Service Board
P. O. Box 1771
San Antonio, Texas 78296

Robert Hager, Esquire
Citizens Concerned About Nuclear Power
5106 Casa Oro
San Antonio, Texas 78233

A. vonRosenberg
City Public Service Board
P. O. Box 1771
San Antonio, Texas 78296

Lanny Sinkin
2207-D, Nueces
Austin, Texas 78705

Brian E. Berwick, Esquire
Assistant Attorney for the State of Texas
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Jay Gutierrez, Esquire
Hearing Attorney
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

South Texas Project
Units 1 and 2

§
§
§
§
§
§
§

Docket Nos. 50-498
50-499

AFFIDAVIT

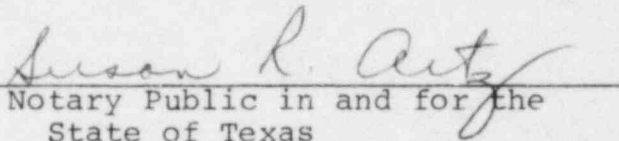
J. H. Goldberg being duly sworn, hereby deposes and says that he is a Vice President of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Report 81-10; that he 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.



J. H. GOLDBERG
VICE PRESIDENT - NUCLEAR ENGINEERING
AND CONSTRUCTION

STATE OF TEXAS §
§
COUNTY OF HARRIS §

Subscribed and sworn to before me, a Notary Public
in and for Harris County, Texas this 4th day of June, 1981.


Notary Public in and for the
State of Texas

My Commission Expires:

6-30-81