

The Light company

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

May 28, 1981

ST-HL-AE-673

SFN: C-0570

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

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
RESPONSE TO NRC INSPECTION FINDINGS
DOCKET NOS. 50-493/81-01 AND 50-499/81-01

Dear Mr. Madsen:

The following is our response to your letter dated May 5, 1981 regarding protection of in-place equipment. We concur with your conclusion that construction activities may cause such equipment to be exposed to harsher conditions than those experienced in storage areas. However, it should be noted that for most items a storage level is specified for the entire item, whereas only certain critical features of the item actually require storage at the specified level. Since it is not practical to recreate a warehouse environment throughout the plant during construction, it is our intent to provide the same degree of protection for the critical features of in-place equipment as that afforded in storage areas. This will be accomplished as outlined in our letter of April 13 with the additional condition that procedure GCP-35 (Permanent Plant Maintenance) will be revised. The revision will require that the Area Manager or his designee responsible for preparing Equipment Storage and Maintenance Instruction Record (ESMIR) cards consider protection of critical features from specifically identified deleterious environments as characterized in ANSI N45.2.2.

An example would be pump/motor assemblies previously stored in a level B warehouse environment. In the case of in-place protection the critical features of the pump/motor assembly would have the same degree of protection as afforded by the warehouse. This would be done by sealing off internals, protection of machined flange surfaces, tape around seals, energized motor heaters, and sealing the motor against entry of water or airborne contamination. The protection identified above would not include protecting non-critical features such as the pump casing against airborne or water contamination.

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In conclusion we feel that this additional information should adequately resolve your concerns. The procedure (GCP-35) will be revised on or before June 30, 1981. If you have any further questions regarding this item, please contact me.

Very truly yours,

J. H. Goldberg for

G. W. Oprea, Jr.
Executive Vice President

GWO:dka

Houston Lighting & Power Company

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ADD TO NOTE #7

The Area Manager or his engineer will physically participate in the weekly inspection.

If the Area Manager is not available for the walk-through, the reason for his not being there will be stipulated on the walk-through report.

NOTE UNDER #2

When generating the in-place protection requirements, the Area Manager or his designee shall consider the following environmental conditions (as applicable):

1. Sudden temperature changes
2. Humidity and vapors
3. Physical damage
4. Airborne contamination
6. Adjacent construction activities
7. Inclement weather

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

| | | |
|--------------------------|---|--------------------|
| In the Matter | S | |
| | S | |
| Houston Lighting & Power | S | Docket Nos. 50-498 |
| Company, et al., | S | 50-499 |
| | S | |
| South Texas Project | S | |
| Units 1 and 2 | S | |

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 81-01; 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

J.H. Goldberg
Vice President
Nuclear Engineering and Construction

STATE OF TEXAS S
 S
COUNTY OF HARRIS S

Subscribed and sworn to before me, a Notary Public in and for Harris County, Texas this 3rd day of June, 1981.

Angelina K. Self
Angelina K. Self
Notary Public in and for the
State of Texas



My commission expires:

2/17/85