

The Light company

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

April 14, 1983
ST-HL-AE-944
File No: G3.8/G9.14

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

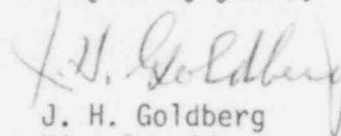
South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Supplement 1 to NUREG-0737 -
Requirements for Emergency Response Capability

Houston Lighting & Power Company (HL&P) has reviewed your letter of December 17, 1982, entitled, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability (Generic Letter No. 82-33)." HL&P has attended an NRC Regional Workshop on this subject, and has additionally reviewed and incorporated in this response the information provided at the workshop. It has been determined that, given the present status of construction at the South Texas Project, the applicable requirements of the letter to the South Texas Project will be implemented prior to the scheduled fuel load date for Units 1 & 2.

A breakdown of the requirements of the letter applicable to the South Texas Project is provided in the attachment to this letter. HL&P's proposed response to each requirement is correspondingly indicated in the attachment. HL&P has determined that a phased integration plan for emergency response activities, as requested in the letter, is unnecessary and inappropriate since all applicable requirements will be implemented prior to the scheduled fuel load date for Units 1 & 2.

Scheduled dates provided are subject to South Texas Project construction progress. HL&P does not anticipate any significant changes to these dates.

Very truly yours,



J. H. Goldberg
Vice President
Nuclear Engineering and Construction

TAP/na
Attachment

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A PDR

Houston Lighting & Power Company

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Page 2

cc: G. W. Oprea, Jr.

J. H. Goldberg

J. G. Dewease

J. D. Parsons

D. G. Barker

M. R. Wisenburg

R. A. Frazar

J. W. Williams

R. J. Maroni

J. E. Geiger

H. A. Walker

S. M. Dew

J. T. Collins (NRC)

H. E. Schierling (NRC)

W. M. Hill, Jr. (NRC)

M. D. Schwarz (Baker & Botts)

R. Gordon Gooch (Baker & Botts)

J. R. Newman (Lowenstein, Newman, Reis, & Axelrad)

STP RMS

Director, Office of Inspection & Enforcement

Nuclear Regulatory Commission

Washington, D. C. 20555

G. W. Muench/R. L. Range
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

H. L. Peterson/G. Pokorny
City of Austin
P. O. Box 1088
Austin, Texas 78767

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

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

Mr. Ernest E. Hill
Lawrence Livermore Laboratory
University of California
P. O. Box 808, L-46
Livermore, California 94550

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

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

Lanny Sinkin
Citizens Concerned About Nuclear Power
5106 Casa Oro
San Antonio, Texas 78233

Citizens for Equitable Utilities, Inc.
c/o Ms. Peggy Buchorn
Route 1, Box 1684
Brazoria, Texas 77422

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

Revision Date 12-20-82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

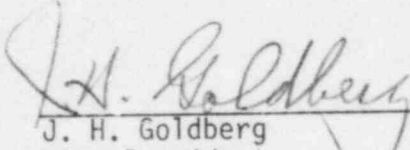
South Texas Project
Units 1 and 2

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Docket Nos. 50-498
50-499

AFFIDAVIT

J. H. Goldberg being duly sworn, hereby deposes and says that he is Vice President, Nuclear Engineering and Construction of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached "Response to Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability"; 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

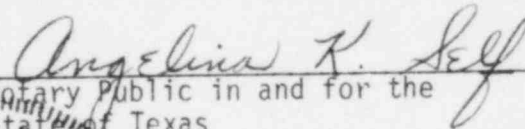
STATE OF TEXAS §
§
COUNTY OF HARRIS §

Subscribed and sworn to before me, a Notary Public in and for Harris County, Texas this 14th day of April, 1983.

My commission expires:

2/17/85





Notary Public in and for the
State of Texas

Identified Requirements of Supplement 1 to NUREG-0737
Applicable to the South Texas Project Units 1 & 2
Docket Nos. STN 50-498, STN 50-499

1. Safety Parameter Display System (SPDS)
(NUREG-0737, Item I.D.2)

Current Status of SPDS Design:

The South Texas Project SPDS will be incorporated in the Emergency Response Facilities Data Acquisition and Display System. The SPDS will provide a concise display of critical plant variables identified as Type B variables during the analysis performed to respond to Regulatory Guide 1.97, Revision 2. The system conceptual design and a preliminary data base have been established, and a specification is currently being prepared for system procurement. SPDS displays will be located on the operator's console in the control room, and in the Technical Support Center and the Emergency Operations Facility.

Date for Submittal of Safety Analysis and Verification Validation Plan:

February 1985. It is expected this information will be submitted in the form of an FSAR amendment.

SPDS Implementation Schedule:

SPDS design completed - June 1984.
SPDS installed - February 1986.
SPDS operational - June 1986.
Operators fully trained on SPDS - December 1986.

Pre-Implementation Review:

Pre-Implementation Review by NRC is not considered necessary. Normal review of FSAR amendment of February 1985 is expected.

2. Detailed Control Room Design Review (DCRDR)
(NUREG-0737, Item I.D.1)

Current Status of DCRDR:

A detailed Control Room Design Review (CRDR) is being performed by Torrey Pines Technology for Houston Lighting & Power Company with Bechtel Energy Corporation acting as agent. The CRDR Program Plan was reviewed at a meeting with the NRC on October 5, 1982. On October 20, 1982, the CRDR Program Plan was submitted to the NRC.

The CRDR, combined with modifications to meet Regulatory Guide 1.97, Revision 2, and engineering design evolution has resulted in the re-layout of six of the main control room panels and various modifications to the remaining control room panels. An Implementation Plan Report (interim report) summarizing the CRDR, the proposed control room design changes, and the proposed methods of implementing the design changes has been prepared and was submitted to the NRC on April 7, 1983.

Verification and validation of the revised control room design will occur after design changes are completed and Regulatory Guide 1.97 upgrades are implemented. The CRDR Summary Report will then be issued to summarize the CRDR results, final control room changes, conclusions and recommendations. Technical details concerning the CRDR Summary Report will be found in the Criteria Report, the Operating Experience Review Report, the System Function and Task Analysis Report, the Control Room Survey Report, the Annunciator Report, and the Special Studies Report.

Date for Submittal of Program Plan:

October 20, 1982. (The Program Plan has already been submitted.)

Date for Submittal of Implementation Plan Report with Proposed Control Room Design Changes:

April 7, 1983. (The Implementation Plan Report has already been submitted.) NOTE: NRC review of Implementation Plan Report and in-progress audit of control room mock-up (in May 1983) has been requested in this April 7, 1983 submittal.

Date for Submittal of Final
Summary Report with Final
Control Room Design Changes:

October 1983.

Implementation Schedule for
Control Room Changes:

Control room design completed - September
1983.

Control panels fabrication completed -
March 1984.

Control panels installation complete -
December 1985.

3. Regulatory Guide 1.97, Revision 2 and Meteorological Data -
Application to Emergency Response Facilities
(NUREG-0737, Items II.F.1 and III.A.2.2)

Current Status of Regulatory Guide
1.97, Revision 2 and Meteorological
Data Programs:

An analysis based on the Westinghouse general design basis was conducted to develop a plant specific response to the intent of Regulatory Guide 1.97, Revision 2. This analysis identified the appropriate variables and established appropriate design bases and qualification criteria for instrumentation utilized by the control room operator during and following an accident. The upgrades identified are being incorporated into the individual systems and control room designs in a manner to support the South Texas Project construction schedule. A table of post-accident monitoring variables and the plant specific design basis will be incorporated into the FSAR.

Implementation Schedule for
Regulatory Guide 1.97, Revision 2:

FSAR amendment - August 1984.
Regulatory Guide 1.97, Revision 2
implementation - December 1986.

4. Emergency Operating Procedures (EOPs)
(NUREG-0737, Item I.C.1)

Status of EOP Development:	The South Texas Project EOPs are being developed utilizing the Westinghouse Generic Guidelines. The EOPs are scheduled to be completed in mid-1985 to allow for sufficient time for training prior to fuel load.
Submittal Date for Technical Guidelines:	November 30, 1981. This information was submitted by Westinghouse.
Submittal Date for Procedures Generation Package:	June 1985.
Date to Begin Formal Operator Training:	October 1985.
Implementation Date of EOPs:	December 1986.

5. Integrated Training Plan

Status of Training Plan:

Operator training at the South Texas Project will include among other areas, training in the normal and post-accident use, system response, and design basis of the SPDS and instrument displays based on Regulatory Guide 1.97, Revision 2; the CRDR; the functions and capabilities of the Emergency Response Facilities; and the use of the Emergency Operating Procedures. Trainee performance will be evaluated during classroom and on-the-job training. The operator training program will be revised as on-the-job evaluations indicate the necessity. The operator training program is based on the program objective of developing operator ability to comprehend plant conditions and to cope with emergencies effectively.

Date for Completion of Training Plan:

The Operator Training Plan completed - August 1985.
Operator training completed - December 1986.

6. Emergency Response Facilities (ERFs)
(NUREG-0737, Item III.A.1.2)

Status of ERFs:

The Technical Support Center (TSC) is presently under construction. The Operational Support Center (OSC) will be located in the Administration Building which has been completed. Specific OSC facility requirements are currently under development. The Emergency Operations Facility (EOF) is currently being developed. Construction of the EOF is planned to begin in the second half-1983.

Completion Dates for Fully
Functional TSC, OSC and EOF:

The TSC, OSC and EOF will be fully functional by December 1986.