

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77383

May 01, 1992
ST-HL-AE-4085
File No.: G03.13
10CFR2.206

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

Attention: Dr. T. E. Murley

STP response

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Additional Information In Response to
10CFR2.206 Petition and Related Allegations

Reference: 1) 10CFR2.206 Petition dated February 10, 1992
2) HL&P Response to 10CFR2.206 Petition dated
March 11, 1992 (ST-HL-AE-4029)

Dear Dr. Murley:

HL&P is providing the attached information to augment the initial response submitted by Reference 2. This additional information is the result of further HL&P investigations of the original issues of Reference 1, investigation of additional information provided by the petitioner subsequent to his petition, and review of items identified by the NRC inspection team assigned to investigate the petitioner's allegations. A number of the allegations could not be substantiated or were found to be incorrect. Of the allegations which were substantiated, none resulted in conditions adverse to safety. HL&P has implemented corrective actions and improvements as warranted based on the results of the investigations.

The attachment is divided into four parts. The first section describes allegations not addressed in Reference 2 which were identified subsequent to the petition or which were not in the scope of the petition. The second section provides an update on the issues addressed in HL&P's response (Ref.2). In the third section HL&P addresses items identified by the NRC inspection team. The fourth section is an assessment of the overall significance of the items substantiated during the investigation.

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PDR FOIA
SAPORIT94-380 PDR
L&LIC/petition

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 4
FOIA 94-380

A Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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Pursuant to 10CFR2.790, HL&P requests that this letter and its attachments be withheld from public disclosure because they contain information provided in confidence during interviews with employees. The basis for withholding this information is more fully set forth in the attached affidavit.

HL&P will continue to provide the NRC with any assistance it requires for the review of the issues raised by the petitioner. If you have any questions, please call me at 512-972-8434.



D. P. Hall
Group Vice President,
Nuclear

AWH/hg

Attachments: 1) Affidavit re Application for Non-disclosure
2) Additional Information in Response to 10CFR2.206
Petition and Related Allegations

cc: R. D. Martin, NRC Region IV
G. F. Dick, Jr. NRR
J. I. Tapia, NRC SR. Resident

Houston Lighting & Power Company
South Texas Project Electric Generating Station

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*NOTE: The above copies distributed without the attachment,
except as noted by asterisk (*)

Revised 10/11/91

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:

Houston Lighting & Power
Company, et al.,South Texas Project
Units 1 and 2)
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)
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)Docket Nos. STN 50-498
STN 50-499AFFIDAVIT

D. P. Hall, being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of Houston Lighting & Power Company (HL&P) and that he is duly authorized to review the information in the attached Response to 10CFR2.206 Petition and apply for the withholding of information from disclosure pursuant to 10CFR2.790. In addition:

- 1) Much of the information in this submittal has been held in confidence by HL&P. In particular, information obtained through interviews with working level personnel has been held in confidence.
- 2) Substantial portions of the information discussed in this submittal have been obtained through HL&P's SPEAKOUT program, a confidential employee safety concern program, and are not otherwise available. Due to the nature of some of the information discussed in this submittal, it is possible to determine the identity of an individual who provided information to SPEAKOUT. The identity of employees who provide information to SPEAKOUT is customarily held in confidence by HL&P.
- 3) As I understand it, the NRC's policy is also to protect the identity of persons who provide information in confidence, and this submittal is being made with this understanding.
- 4) The information gained through interviews with employees is not available through public sources.

AFFIDAVIT

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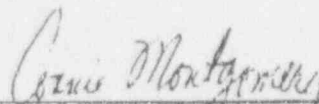
- 5) Public disclosure of this information could cause harm to HL&P and the public. In order to operate the South Texas Project Electric Generating Station (STPEGS) safely, HL&P relies upon employees to come forward with safety concerns. These concerns cannot be addressed unless they are made known, and in many cases employees are more comfortable bringing forward concerns on a confidential basis so that their identities are protected. Without such protection, many concerns might go unreported. This could adversely affect safety and HL&P's commercial position.



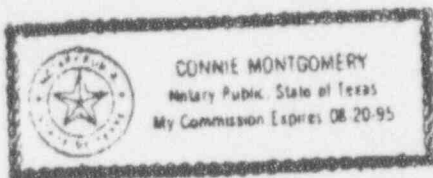
D. P. Hall
Group Vice President,
Nuclear

STATE OF TEXAS)
)
)

Subscribed and sworn to before me, a Notary Public in and for
The State of Texas this 1st day of May, 1992.



Notary Public in and for the
State of Texas



Additional Information in Response to 10CFR2.206
Petition and Related Allegations

- I. New Items
- II. Update on Previously Identified Items
- III. Items Identified by the Inspectors
- IV. HL&P Assessment