

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

August 16, 1995
ST-HL-AE-5146
File No.: G03.08
10CFR50.54(f)

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

South Texas Project
Unit 1 and 2
Docket No. STN 50-498, STN 50-499
Licensee Event Report 95-002

Response to Nuclear Regulatory Commission Generic Letter 92-01, Revision 1, Supplement 1
"Reactor Vessel Structural Integrity"

- References:
- 1) Correspondence from Houston Lighting and Power Company to the Nuclear Regulatory Commission, Letter ST-HL-AE-4108, "Response to NRC Generic Letter 92-01, Revision 1, dated June 5, 1992
 - 2) Correspondence from Houston Lighting and Power Company to the Nuclear Regulatory Commission, Letter ST-HL-AE-4819, "Generic Letter 92-01, Revision 1, dated June 21, 1994

Pursuant to 10CFR50.54 (f), Houston Lighting & Power Company submits the attached Response to Generic Letter 92-01, Revision 1, Supplement 1, Part (1) for the South Texas Project.

The response to part (1) of the Generic Letter describing actions underway to acquire relevant data is provided in Attachment 2. As described below, the response to parts (2), (3), and (4) will be submitted by May 19, 1997.

The reactor pressure vessels at the South Texas Project were built by Combustion Engineering. The reactor pressure vessels have very low copper and nickel content in the welding and shell materials. South Texas Project has joined the Combustion Engineering Owners Group as a member of the Reactor Vessel Working Group. The Reactor Vessel Working Group will address Generic Letter 92-01, Revision 1, Supplement 1 by collecting relevant data for reactor vessel welds fabricated by Combustion Engineering.

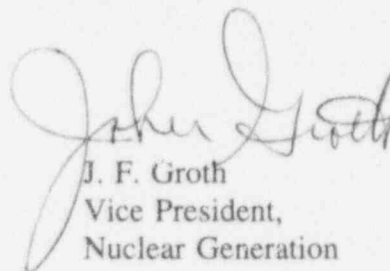
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Project Manager on Behalf of the Participants in the South Texas Project

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Houston Lighting and Power Company, as a member of both the Westinghouse and Combustion Engineering Owners Groups, will require an additional 18 months to submit parts (2), (3), and (4) of the subject Generic Letter as described in Attachment 2 to this letter. Houston Lighting and Power will submit a response to parts (2), (3), and (4) not later than May 19, 1997.

If you should have any questions on this matter, please contact Mr. M.A. McBurnett at (512) 972-7206 or me at (512) 972-8664.



J. F. Groth
Vice President,
Nuclear Generation

HRP/lf

- Attachments:
1. Affidavit
 2. Generic Letter 92-01, Revision 1, Supplement 1 Response
 3. Letter to the Nuclear Regulatory Commission from Combustion Engineering Owners Group, CEOG-95-390, dated July 27, 1995

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-5146
File No.: G003.0825
Page 3

c:

Leonard J. Callan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Thomas W. Alexion
Project Manager
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001 13H15

David P. Loveless
Sr. Resident Inspector
c/o U. S. Nuclear Regulatory Comm.
P. O. Box 910
Bay City, TX 77404-0910

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

K. J. Fiedler/M. T. Hardt
City Public Service
P. O. Box 1771
San Antonio, TX 78296

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

C. A. Johnson
Central Power and Light Company
P. O. Box 289, Mail Code: N5012
Wadsworth, TX 77483

David Sager
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, CT 06095-0500

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61067
Houston, TX 77208

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

U. S. Nuclear Regulatory Comm.
Attn: Document Control Desk
Washington, D. C. 20555-0001

J. R. Egan, Esquire
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, D.C. 20037

J. W. Beck
Little Harbor Consultants, Inc.
44 Nichols Road
Cohasset, MA 02025-1166

ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

AFFIDAVIT

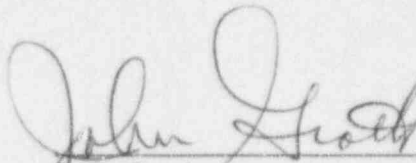
In the Matter)

Houston Lighting & Power)
Company, et al.,)

Docket Nos. 50-498
50-499

South Texas Project)
Units 1 and 2)

I, J. F. Groth, being duly sworn, hereby depose and say that I am Vice President, Nuclear Generation, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached Response to NRC Generic Letter 92-01, Revision 1, Supplement 1, Part (1) Reactor Vessel Structural Integrity; that I am familiar with the content thereof; and that the matters set forth therein are true and correct to the best of my knowledge and belief.

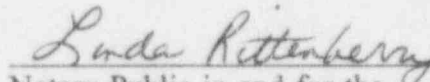

J. F. Groth
Vice President,
Nuclear Generation

STATE OF TEXAS)

COUNTY OF MATAGORDA)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas,
this 16th day of August, 1995.




Notary Public in and for the
State of Texas

ATTACHMENT 2

**HOUSTON LIGHTING AND POWER COMPANY
SOUTH TEXAS PROJECT**

**GENERIC LETTER 92-01, REVISION 1, SUPPLEMENT 1
RESPONSE**

HOUSTON LIGHTING AND POWER COMPANY
SOUTH TEXAS PROJECT
GENERIC LETTER 92-01, REVISION 1, SUPPLEMENT 1
RESPONSE

The South Texas Project Unit 1 and Unit 2 reactor pressure vessels have very low copper and nickel content in the welding and shell materials. During fabrication of the South Texas Project reactor vessels, copper coated submerged arc weld wire or cold nickel wire feeds were not used. As a result, the South Texas Project reactor vessels' welding and shell materials have copper content well below 0.10% and nickel content well below 0.25%. A review of the Nuclear Regulatory Commission's recently published Reactor Vessel Integrity Database identifies that the South Texas Project Unit 1 weld wire heat number 89476 and Unit 2 weld wire heat number 90209 used in the fabrication of the reactor vessels are unique with no other domestic nuclear plant reporting these heats of weld wire in the fabrication of their reactor vessels.

As a low copper and nickel plant, the chemical variability from the same heat of weld wire or shell material reported at sister plants will have a negligible effect on Pressurized Thermal Shock Evaluations, Upper Shelf Energy Evaluations, Low Temperature Over-pressure Limits, or Pressure Temperature Limits. However, in accordance with the guidance provided by the Nuclear Regulatory Commission staff at the July, 1995 Reactor Vessel Integrity Workshop, the South Texas Project has taken the following actions to find all relevant data.

- 1) In response to Generic Letter 92-01, Revision 1 an extensive document review was conducted. This review included Material Certification Reports from the Vendor Data Packages, Westinghouse WCAP reports for Radiation Surveillance Program and Evaluations of Pressurized Thermal shock, and the South Texas Project Updated Final Safety Analysis Report and Technical Specifications.
- 2) The South Texas Project as a member of the Westinghouse Owners Group is participating in the development of the Reactor Materials Database Project (RPVDATA).
- 3) The South Texas Project recently became a member of the Combustion Engineering Owners Group Reactor Vessel Working Group. The Reactor Vessel Working Group Program will address Generic Letter 92-01, Revision 1, Supplement 1 and will result in collection of relevant data for reactor vessel welds fabricated by Combustion Engineering. The data will include identification of sister plant copper and nickel values, weld wire heat numbers, flux type, and lot numbers. The intent, scope, and identification of the Owners Group members are identified in Attachment 3.

Generic Letter 92-01
Revision 1, Supplement 1

Response - Continued

- 4) Upon completion of the Combustion Engineering Owner Group Reactor Vessel Working Group Program and the Westinghouse Reactor Materials Database Project (RPV DATA), Houston Lighting and Power Company will review sister plant chemistries for welding and shell materials from the same heat. The anticipated completion date for the Combustion Engineering and Westinghouse Owners Groups is November, 1996.
- 5) Houston Lighting and Power Company will review the Electric Power Research Institute's RMATCH data base and the Nuclear Regulatory Commission's Reactor Vessel Integrity data base to locate sister plant information that is relevant.

The relevant data gathered from the above identified activities will be utilized to respond to Generic Letter 92-01, Revision 1, Supplement 1 parts (2), (3), and (4) not later than May 19, 1997

ATTACHMENT 3

**LETTER TO
THE NUCLEAR REGULATORY COMMISSION FROM
COMBUSTION ENGINEERING OWNERS GROUP
CEOG-95-390, DATED JULY 27, 1995**