

The Light company

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

April 10, 1992

ST-HL-AE-4055
File No.: G26
10CFR50

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

South Texas Project
Unit 1
Docket No. STN 50-498
Change of a Commitment Made to the NRC

Houston Lighting & Power (HL&P) submits this letter to inform the Nuclear Regulatory Commission (NRC) of a change to a commitment made as a result of Unit 1 Licensee Event Report (LER) 89-017 regarding an event which involved an inadvertent contamination of nonradioactive systems. HL&P informed the NRC of the event that occurred on August 14, 1989, which resulted in the contamination of the Liquid Waste Processing System (LWPS), the auxiliary boiler and the inorganics basin. The incident occurred after two valves were left open during shutdown of the LWPS waste evaporator, allowing liquid waste to backup through the waste evaporator gas stripper into the auxiliary steam system. The causes were identified as: 1) inadequate controls over the interfaces between radioactive and nonradioactive systems; 2) failure of chemical operations personnel to follow proper procedure; and 3) absence of radiation monitors in the auxiliary steam system. Corrective actions included were to perform a review of radioactive to non-radioactive system interfaces, revise procedures and review the implementation of the station policy regarding procedure compliance.

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Reviews of system interfaces between radioactive and non-radioactive systems resulted in the initiation of modifications which would add a radiation monitor to the Steam Generator Blowdown (SGBD) flash tank relief valve (Modifications Nos. 89228 and 89229) and a radiation monitor to the Liquid Waste Processing System (LWPS)/Boron Recycle System (BRS) crossconnect (Modifications Nos. 89230 and 89231). During the week of December 11-14, 1990, NRC inspectors reviewed this LER and found the LER investigation to be acceptable based on the corrective actions identified. The LER closure was documented as part of NRC Inspection Report 90-039, which noted HL&P's intent to perform the modifications which resulted from the LER reviews. Subsequently, STP has determined that these modifications are no longer necessary.

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A Subsidiary of Houston Industries Incorporated

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The following is the justification for the deletion of Modifications 89228 and 89229:

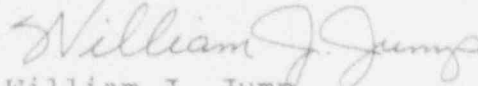
The SGBD relief valve is not a normal discharge path. The valve will open in cases of SGBD flash tank overpressure, which can occur only if the SGBD automatic control fails. On each SGBD line there is a safety grade radiation monitor upstream of the flash tank. If these radiation monitors alarm, which is indication of a primary to secondary leak, the associated SGBD line is isolated in accordance with procedures. If the SGBD flash tank relief valve should lift, the existing radiation monitors can be used to make an estimate of any activity discharged which is consistent with the current Offsite Dose Calculation Manual (ODCM) practice. HL&P considers the above to constitute adequate administrative control of the SGBD flash tank relief valve discharge and no design change is considered necessary.

The following is the justification for the deletion of Modifications 89230 and 89231:

Investigations into these Modifications has determined that the crossconnect isolation valve is locked closed and is already controlled by the locked valve procedure. HL&P considers this adequate administrative control of this cross connect path. Furthermore, this cross connect valve is an interface point between two radioactive systems, and should not have been originally included as an interface with nonradioactive system.

In conclusion, HL&P believes that adequate administrative controls exist to delete these modifications. The additional corrective actions addressed in the LER 89-017, adequately address prevention of recurrence of this event. By deletion of these modifications there will be no impact to the health and safety of the public.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7205.


William J. Jump
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JMP/lf

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South Texas Project Electric Generating Station

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