

# The Light company

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

May 09, 1996  
ST-HL-AE-5339  
File No.: G3.02  
10 CFR 50.71

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

South Texas Project  
Unit 1 and Unit 2  
Docket Nos. STN-50-498 and 50-499  
South Texas Project Updated Final Safety Analysis Report Section 7A.II.K.3.17  
Requirement to Report Emergency Core Cooling System Outages

The Updated Final Safety Analysis Report (UFSAR) Section 7A.II.K.3.17 requires submittal of a report detailing outage dates and lengths of outages for all Emergency Core-Cooling Systems (ECCS) after five years of operation. The South Texas Project believes that this UFSAR requirement is no longer relevant, considering the evolution of performance monitoring requirements since the writing of NUREG-0737, Section II.K.3.17. The South Texas Project has numerous methods for ensuring compliance with the intent of Section II.K.3.17. Later rules, regulations for reporting and reliability (i.e. Maintenance Rule, NPRDS, Performance Monitors, INPO Availability Reports) ensure that the intent of Section II.K.3.17 is met.

The Nuclear Energy Institute (NEI) has issued guidance for managing and changing commitments to the Nuclear Regulatory Commission which the Nuclear Regulatory Commission has recently endorsed for use by licensees. The above mentioned UFSAR reporting requirement has been evaluated for deletion using this process. The deletion of this requirement has been determined to not be an unresolved safety question. As such, this reporting requirement will be removed from the UFSAR and the change will be submitted during the biennial 10 CFR 50.59 summary report to the Nuclear Regulatory Commission.

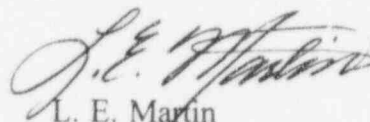
Should you have any questions, please contact Mr. H. R. Pate at (512) 972-7787 or me at (512) 972-8686.

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South Texas Project Electric Generating Station

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