

The Light company

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

June 17, 1985
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File Number: G3.8

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

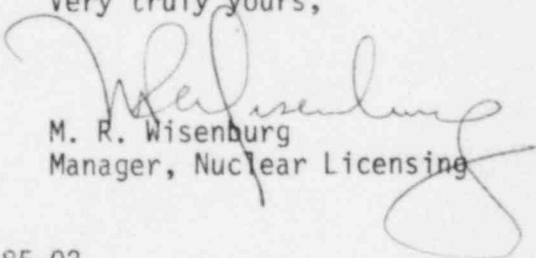
South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to NRC Generic Letter 85-02
"Staff Recommended Actions Stemming From
NRC Integrated Program for the Resolution of
Unresolved Safety Issues Regarding
Steam Generator Tube Integrity"

Dear Mr. Thompson:

NRC Generic Letter 85-02, dated April 17, 1985, requested that Houston Lighting & Power Company (HL&P) provide a description of the overall program to be followed at the South Texas Project Electric Generating Station (STPEGS) for assuring steam generator tube integrity and for steam generator tube rupture mitigation. The attached report addresses the concerns of the Generic Letter.

If there are any questions, please contact Mr. Mark A. McBurnett at (512)972-3651, extension 6054.

Very truly yours,


M. R. Wisenburg
Manager, Nuclear Licensing

PLW/bjf

Attachment: Response to NRC Generic Letter 85-02

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Washington, DC 20555

South Texas Project
Units 1 & 2
Response to NRC Generic Letter 85-02

1.a Prevention and Detection of Loose Parts (Inspections)

The South Texas Project (STP) is in the process of contracting for Preservice Inspection eddy current testing of steam generator tubes for a 100 percent baseline inspection which will concurrently look for loose parts in the tube sheet and support plate areas. A preservice visual inspection of the secondary side will also be performed.

STP has no current plans for in-service visual inspections unless indicated by the Loose Parts Monitoring System, Inservice Inspection eddy current indications, or in case of secondary side repairs or modifications.

1.b Prevention and Detection of Loose Parts (Quality Assurance)

The STP Operations QA plan (Section 5.0) provides programmatic directions for accountability, controls, cleanliness, etc. Procedures for implementation have not yet been written.

2.a Inservice Inspection Program (Full Length Tube Inspection)

STP intends to inspect steam generator tubing in accordance with the Standard Technical Specifications. Tubes will be inspected on the hot leg side and on the cold leg side, although the same tube will not necessarily be chosen for both. Supplemental sample inspections will be made in areas of interest and where indicated by previous inspection results.

2.b Inservice Inspection Program (Inspection Interval)

STP Technical Specifications conform to the Standard Technical Specifications. The recommended sampling rate may result in an interval greater than 72 months for complete steam generator tube inspection.

3.a Secondary Water Chemistry Program

STP Secondary Water Chemistry Program will incorporate the guidelines in EPRI/SGOG Special Report NP-2704, "PWR Secondary Water Chemistry Guidelines". In addition, STP has incorporated additional equipment to enhance control of the secondary water chemistry.

3.b Condenser Inservice Inspection Program

STP plans to use a non-safety-related procedure to perform condenser inspections. Use of titanium condenser tubes, continuous conductivity and sodium ion analysis of condenser water, and two-tier condensate polishing will minimize the effects of condenser leaks on steam generator tubes. Method of repair of leakage and methodology for determining the cause(s) of leakage will be commensurate with conditions. Preventive maintenance will be performed as necessary.

4. Primary to Secondary Leakage Limit

STP Technical Specifications are consistent with the Standard Technical Specifications.

5. Coolant Iodine Activity Limit

STP Technical Specifications are consistent with the Standard Technical Specifications.

6. Safety Injection Signal Reset

This recommended action is not applicable to STP. Safety injection pump suction is taken only from the Refueling Water Storage Tank.

Information Concerning Category C-2 Steam Generator Tube Inspections

STP policy is consistent with the Standard Technical Specifications. The current policy does not differ regarding Category C-2 inspection results.