

The Light company

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October 24, 1985

ST-HL-AE-1462

File No.: G9.17

Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Responses to DSER/FSAR Items
Q430.108, RG 1.63 Rev. 2

Dear Mr. Knighton:

The attachments enclosed provide STP's response to Draft Safety Evaluation Report (DSER) or Final Safety Analysis Report (FSAR) items.

The item numbers listed below correspond to those assigned on STP's internal list of items for completion which includes open and confirmatory DSER items, STP FSAR open items and open NRC questions. This list was given to your Mr. N. Prasad Kadambi on October 8, 1985 by our Mr. M. E. Powell.

The attachments include mark-ups of FSAR pages which will be incorporated in a future FSAR amendment unless otherwise noted below.

The items which are attached to this letter are:

<u>Attachment</u>	<u>Item No.*</u>	<u>Subject</u>
1	Q430.108	RG 1.63, Rev. 2

* Legend

D - DSER Open Item
F - FSAR Open Item

C - DSER Confirmatory Item
Q - FSAR Question Response Item

LL/DSER/aa1

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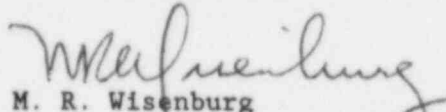
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If you should have any questions concerning this matter, please contact Mr. Powell at (713) 993-1328.

Very truly yours,


M. R. Wisenburg
Manager, Nuclear Licensing

JSP/bl

Attachments: See above

L1/DSER/aal

cc:

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Revised 9/25/85

Question 430.108N

Staff's review of the FSAR is guided by the current revision of the applicable regulatory guides and the referenced standards. Tables 3.12-1 and 8.1-2 list old revisions of guides and standards for STP compliance. Clearly identify the differences between STP design and the requirements of the current revisions of the regulatory guides and the referenced standards listed below. Justify the differences.

<u>Guide (Standard)</u>	<u>Current Revision</u>	<u>Revision Listed in the Tables</u>
RG 1.9	Rev. 2 (12/79)	Rev. 0 (3/71)
RG 1.63	Rev. 2 (7/78)	Rev. 0 (10/73)
RG 1.75	Rev. 2 (9/78)	Rev. 1 (1/75)
IEEE Std 338	1975 - (incorp. by R.G. 1.118)	1971
IEEE Std 387	1977 - (incorp. by RG 1.9)	1972

Response

Table 8.1-2 has been revised as shown:

RG 1.118 (IEEE 338-1977)
RG 1.9 (IEEE 387-1977)

Table 3.12-1 has been revised as shown:

RG 1.9 Rev. 2 (12/79) FSAR Ref. 8.3.1.1.4.7, Status C
RG 1.118 FSAR Ref. 8.3.1.1.4.7 Rev. Status Rev. 2 (6/78),
Status A

The only substantive difference between Rev. 1 and Rev. 2 of RG 1.75 is the addition of the following paragraph in Rev. 2:

This guide addresses only some aspects of defense against the effects of fires. Additional criteria for protection against the effects of fires are provided in Regulatory Guide 1.120, "Fire Protection Guidelines for Nuclear Power Plants."

STP uses an alternate approach for RG 1.120 (fire protection); the criteria used is specified in BTP 9.5.1 Appendix A.

Compliance with RG 1.75 Rev. 2 is as stated in Section 8.3.1.4, with exceptions as stated in Sections 7.1.2.2.1 and 8.3.1.4.4.14 items No. 6 and 8.

The differences between STP design and the requirements of RG 1.63 Revision 2 with justification will be included in our response to Q430.21N.

INSERT

INSERT

The vendors have confirmed that the STP electric penetration prototype tests were made in accordance with RG 1.63, Rev. 2 .

Also, all other aspects of the STP electric penetrations meet the requirements of RG 1.63, Rev. 2 .