

# The Light company

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

October 29, 1996  
ST-HL-AE-5488  
File No.: G03.03  
10 CFR 50

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Resolution of NRC Bulletin 88-08,  
"Thermal Stresses in Piping Connected to Reactor Coolant Systems"

- Reference: 1. Letter from T. W. Alexion, NRC to W. T. Cottle, Houston Lighting and Power, "Resolution of Bulletin 88-08, "Thermal Stresses in Piping Connected to Reactor Coolant Systems", South Texas Project, Units 1 and 2 (STP) (TAC NOS. M93833 and M93823)," dated February 23, 1996
2. Letter from S. E. Thomas, Houston Lighting and Power, to the NRC Document Control Desk, dated July 15, 1996 (ST-HL-AE-5418)
3. Letter from L. E. Kokajko, NRC to W. T. Cottle, Houston Lighting and Power, "Resolution of NRC Bulletin 88-08, "Thermal Stresses in Piping Connected to Reactor Coolant Systems," For South Texas Project, Units 1 and 2 (TAC NOS. M69689 and M69690)," dated April 11, 1994
4. Letter from T. H. Cloninger, Houston Lighting and Power, to the NRC Document Control Desk, dated November 30, 1993 (ST-HL-AE-4639)

In reference 3, the NRC staff concluded, based on the reviewed results of the South Texas Project's (STP) response, reference 4, that the integrity of the piping subject to Bulletin 88-08 is ensured for near-term operation, ten years. Based on the technical details of this issue, STP interprets the ten years of operation as ten years at Normal Operating Temperature (NOT) and Normal Operating Pressure (NOP) when the systems are actually potentially susceptible to stratification. Therefore, STP has determined that this will need to be resolved by the 1999 to 2000 time frame. Based on a telephone conversation between Mr. T. W. Alexion of the NRC staff and Mr. A. W. Harrison of STP on September 11, 1996, we understand that the NRC concurs with this STP interpretation.

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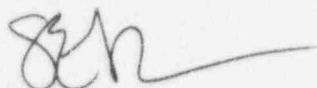
Project Manager on Behalf of the Participants in the South Texas Project

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STP's analysis supports our position that the integrity of the subject piping is ensured for the remaining life of the plant. Furthermore, normal 10 year inservice inspections (ISI) at selected location on the unisolable RCS piping are sufficient to validate that integrity without the necessity of installing instrumentation. STP requests a meeting before January, 1997 in order to resolve any open NRC issues and close this issue.

If you should have any questions concerning this matter, please contact Mr. H. R. Pate at (512) 972-7787 or me at (512) 972-7162.



S.E. Thomas  
Manager,  
Design Engineering

HRP/lf

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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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, Mail Code 13H3  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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

M. T. Hardt/W. C. Gunst  
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

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

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. Bertram Wolfe  
15453 Via Vaquero  
Monte Sereno, CA 95030

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

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