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

August 26, 1985
ST-HL-AE-1323
File No.: G25

Mr. Harold R. Denton
Director, 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
Pollution Control Bond In Furtherance Certificate
Matagorda County Navigation District Number 1
Pollution Control Revenue Bonds, Series 1985

Reference (1) Letter from HL&P to the NRC, ST-HL-AE-1119, dated August 14, 1984, "Pollution Control Bond In Furtherance Certificate Matagorda County Navigation District Number 1 Pollution Control Revenue Bonds, Series 1984"

(2) Letter from HL&P to the NRC, ST-HL-AE-1137, dated October 1, 1984, subject same as (1) above

(3) Letter from NRC to HL&P, dated October 11, 1984, which provides the executed certificate

Dear Mr. Denton:

Houston Lighting & Power Company (HL&P) as managing partner and on behalf of the owners of undivided interests, as listed in the attached draft Certificate, intends to issue pollution control revenue bonds in order to help finance certain facilities which are in furtherance of the purpose of abating or controlling atmospheric pollutants or contaminants, water pollutants, solid and sanitary waste. These Series 1985 bonds are in addition to the Series 1984 bonds for which a NRC review was performed in the fall of 1984, References 1, 2 and 3.

The part of the total cost of these systems attributable to controlling atmospheric or water pollutants will be determined in accordance with methods approved by the Internal Revenue Service (IRS) in prior rulings. These allocation methods have previously been accepted by the NRC in issuing "In Furtherance" Certificates for other nuclear power plants.

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In order to meet requirements of the Internal Revenue Code of 1954, as amended, relating to the issuance of such tax-exempt pollution control revenue bonds, HL&P respectfully requests that the Commission review the attached draft "In Furtherance" Certificate, make any necessary modifications and return a signed Certificate to this office by September 1, 1985.

Your assistance in this matter is greatly appreciated.

Very truly yours,

J. H. Goldberg
Group Vice President, Nuclear

PES/MEP/as

Attachment A Draft Certificate, South Texas Project Electric Generating Station, Units 1 and 2, Pollution Control Facilities

Attachment B Exhibit A, Description of Additional Facilities

cc:
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U. S. Nuclear Regulatory Commission
Washington, DC 20555

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Docketing & Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555

DRAFT
CERTIFICATE
SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
UNITS 1 AND 2

POLLUTION CONTROL FACILITIES

The Nuclear Regulatory Commission (the NRC) hereby certifies as follows:

(a) that it has examined Exhibit A attached hereto which is entitled "Description of Additional Facilities" and which describes certain facilities which have been constructed, are under construction or are to be constructed at the South Texas Project Electric Generating Station - Units 1 and 2, a nuclear electric power generating plant located in Matagorda County, Texas, undivided interests in which plant are owned by Houston Lighting & Power Company, Central Power and Light Company, the City of Austin, Texas and the City of San Antonio, Texas, acting by and through the City Public Service Board of San Antonio, Texas.

(b) that facilities described in paragraphs 1 through 4 of Exhibit A, as designed, are in furtherance of the purpose of abating or controlling atmospheric pollutants or contaminants or water pollutants, resulting from the generating of electricity at the South Texas project Electric Generating Station - Units 1 and 2.

For the Nuclear Regulatory Commission

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Dated at Washington, D. C.
this day of

Exhibit A
Description of Additional Facilities

1. Essenial Cooling System:

The Essential Cooling Pond and Essential Cooling Water System dissipate heat from the primary plant components to the atmosphere during all modes of normal plant operation. The system includes a single 40 acre cooling pond for both units with separate pumps and pipes to convey cooling water to individual heat exchangers of each unit. The pond system also includes a make-up and blowdown system to maintain the water chemistry and inventory in the pond. The system prevents the direct discharge of heated water to the Colorado River as compared with other plants using a conventional once-through cooling water system.

2. MAB Filtered Exhaust:

The MAB filtered exhaust system for each unit collects, filters and discharges building atmosphere from the radio chemistry laboratory and the sample room hoods in the Mechanical Auxiliary Building (MAB). This minimizes offsite radiation doses to ALARA (as low as reasonably achievable) levels. The system includes two filter trains each consisting of 4 air filters. The filters include high efficiency particulate air (HEPA) and carbon filter banks. Also included are 2 fans, dampers, ductwork, controls and instrumentation for each unit. In the absence of ALARA requirements, the MAB exhaust filtration system would not be necessary because the exhaust could be released without treatment.

3. Reactor Building Air Filtration System:

The Reactor Building Air Filtration System filters the reactor building atmosphere to remove airborne radioactivity before discharge during normal plant operation. This minimizes offsite radiation doses to ALARA levels. The system includes two filter trains per unit. Each train includes a prefilter, HEPA filter, charcoal filter and post HEPA filter as well as a fan and associated ductwork, controls and instrumentation. In the absence of ALARA requirements this system would not be necessary because reactor building purge exhaust would be released without treatment.

4. Steam Generator Blowdown Treatment System:

The Steam Generator Blowdown Treatment System collects, processes, treats, recycles and discharges steam generator blowdown. Each unit has a steam generator blowdown treatment system consisting of two prefilters and two mixed-bed demineralizers as well associated valves, piping, controls and instrumentation. In the absence of pollution control requirements, the steam generator blowdown could be directly discharged without treatment.