

The Light company

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

December 16, 1985
ST-HL-AE-1532
File No.: G9.17

Mr. Vincent S. Noonan, Project Director
PWR Project Directorate #5
U. S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to DSER Open Item Regarding Flood Protection

Dear Mr. Noonan:

The attachment enclosed provides STP's response to Draft Safety Evaluation Report (DSER) items.

The item number listed below corresponds 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 item which is attached to this letter is:

<u>Attachment</u>	<u>Item No.*</u>	<u>Subject</u>
1	D 2.4-5	Section 2.4.14 Flood Protection

A response to this item was previously submitted to your office on October 31, 1985 (ST-HL-AE-1474). This response revises the previous response.

*Legend

D - DSER Open Item
F - FSAR Open Item

C - DSER Confirmatory Item
Q - FSAR Question Response Item

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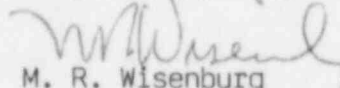
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Houston Lighting & Power Company

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

Very truly yours,



M. R. Wisenburg
Manager, Nuclear Licensing

RLE/yd

Attachment: See above

Houston Lighting & Power Company
cc:

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Washington, DC 20555
(3 Copies)

Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
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Note: The above copies without drawing
except as noted (*).

Revised 12/2/85

DSER Open Item 2.4-5

Provide a procedure to require that waterproof doors and waterproof knockout panels be in a secured position under normal conditions.

Revised Response:

Reference #1 - ST-HL-AE-1103; Final Report Concerning Doors Used for Flood Protection; dated June 11, 1984

#2 - ST-HL-AE-1418; Responses to DSER/FSAR Items
FSAR Sections 2.4, 3.4 and 3.5; dated October 12, 1985

#3 - ST-HL-AE-1293; Response to Main Cooling Reservoir Meeting
Action Items; dated 7/1/85

The reference 1 letter as well as Question & Response 240.04N, outlines the project position regarding watertight doors: "The provision of single waterproof doors, which can be secured if conditions require, provides adequate protection against any credible flood". Also, the reference 2 letter provides the revision to FSAR Section 3.4 which documents this position. This position is further clarified for the following flood events:

1. MCR Breach - This flood event will not dictate the watertight doors to be normally closed, except in the unlikely event anomalies with the MCR embankment are discovered which require remedial action procedures to be implemented. Should this situation arise, as an additional precautionary measure administrative controls will be implemented to keep the watertight doors normally closed and knockout panels on the MEAB in place. This will be further addressed in the MCR Operating Procedures as discussed in the reference 3 letter. Additionally, at the time such remedial action procedures are being implemented, only one Diesel Generator Building knockout panel may be removed at one time.
2. Other flood events - STP will have sufficient warning time prior to being inundated such that closure of the doors and replacement of knockout panels can be accomplished.