

March 17, 2000

MEMORANDUM TO: Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: John A. Nakoski, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation */RA/*

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - DRAFT INFORMATION
PROVIDED BY LICENSEE FOR TELECONFERENCE ON MARCH 14,
2000, TO DISCUSS CONTROL ROOM AND FUEL HANDLING
BUILDING VENTILATION TECHNICAL SPECIFICATION
AMENDMENTS (TAC NOS. MA3849 AND MA3850)

On September 28, 1998, the licensee submitted a request for amendments to the South Texas Project, Units 1 and 2, technical specifications related to allowed outage times for the control room and fuel handling building ventilation systems. In the course of the review of this submittal, the staff determined that the licensee had not provided sufficient compensatory measures to make a finding that adequate protection would be assured under all design-basis conditions. A teleconference was held on March 14, 2000, to discuss this issue with the licensee. In preparation for the teleconference, the licensee provided the staff with a draft of the proposed compensatory measures to address the staff's concern. Attachment 1 provides the draft information provided by the licensee used during the teleconference. Attachment 2 provides the list of participants in the March 14, 2000, teleconference.

Attachments: 1. Draft Compensatory Measures
2. List of Teleconference Participants

Docket Nos. 50-498 and 50-499

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DRAFT

**DRAFT STPNOC RESPONSE TO SUPPORT PHONE CALL
ON AMENDMENT REQUEST TO MODIFY TS REQUIREMENTS
ASSOCIATED WITH CR & FHB VENT SYSTEMS**

The following description is proposed to be added at the end of Insert 6 to TS Bases 3/4.7.7 and at the end of Insert 8 to TS Bases 3/4.7.8. Ref: September 28, 1998 submittal (NOC-AE-000305)

Administrative controls during the limited allowed outage time for all trains to be out of service include the work control process that evaluates the compatibility of current plant conditions prior to the commencement of breaching the common CRE <FHB> HVAC duct plenum. Additionally, the Configuration Risk Management Program will ensure that an acceptable plant risk exists prior to commencing any maintenance where all trains of either common CRE <FHB> HVAC would be rendered inoperable. Compensatory actions to be taken include:

- Surveillances and other plant activities that have a potential plant trip risk should not be conducted as feasible
- Controls will prevent maintenance if a precursor to a design basis accident event is indicated such as increased reactor coolant system leakage or steam generator tube leakage.
- A pre-job brief will be conducted to ensure steps for rapidly terminating the maintenance and restoring the system are understood should plant conditions change.
- A formal communications plan will be put into place to rapidly communicate the need to terminate the maintenance and restore the system.
- Self containing breathing apparatus will be available to the control room operator to minimize dose if necessary.

A new description is proposed to be inserted at the beginning of TS Bases 3/4.7.7 to describe the components of a control room ventilation train. Ref: September 28, 1998 submittal (NOC-AE-000305)

The control room makeup and cleanup filtration system is comprised of three independent trains. An OPERABLE train consists of a main air handling unit, return air fan, makeup air filter unit, control room air cleanup filter unit, appropriate dampers and the associated initiation and actuation channel.

LIST OF PARTICIPANTS IN
MARCH 14, 2000, TELECONFERENCE
ON STP CONTROL ROOM/FHB VENTILATION SYSTEM AMENDMENT

NAME	Position	ORGANIZATION
Scott Head	Supervisor, Licensing	STPNOC
Ken Taplett	Licensing Engineer	STPNOC
John Nakoski	Senior Project Manager, Section 1, PDIV	USNRC
Samuel Lee	Technical Reviewer, SPSB	USNRC
Harold Walker	Technical Reviewer, SPLB	USNRC