



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

December 20, 2000  
NOC-AE-00000914  
File No.: G20.01  
G21.01  
10 CFR 50.90  
10 CFR 50.92  
STI: 31161915

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
License Amendment Request –  
Deletion of License Condition 2.G and Technical Specification 6.6.1.a

Pursuant to 10CFR50.90, STP Nuclear Operating Company requests amendment of Operating Licenses NPF-76 and NPF-80 for South Texas Project Units 1 and 2. The proposed change will delete Condition 2.G, "Reporting to the Commission," and Technical Specification 6.6.1.a, "Reportable Event Action."

The proposed changes are solely administrative in nature and will eliminate notification and reporting requirements from the Facility Operating Licenses and Technical Specifications which are adequately governed by the reporting requirements of 10 CFR 50.72 and 10 CFR 50.73. Additionally, these changes will reduce unnecessary regulatory burden and will allow STP to take advantage of the pending revision to 10 CFR 50.73 that allows for Licensee Event Reports to be submitted within 60 days instead of 30 days as required by the current Condition 2.G. This communication contains no new licensing basis commitments regarding South Texas Project Units 1 and 2.

According to the Federal Register, October 25, 2000 (Volume 65, Number 207), the revision to 10 CFR 50.73 will become effective January 23, 2001. As South Texas Project's Operating Licenses currently maintain the 30-day reporting rule, South Texas Project requests this amendment be approved as soon as possible.

The South Texas Project Plant Operations Review Committee and the Nuclear Safety Review Board have reviewed and approved the proposed change. In accordance with 10 CFR 50.91(b), South Texas Project is providing the State of Texas with a copy of this proposed amendment change.

A 001

If you have any questions concerning this matter, please contact Mr. S. M. Head at (361) 972-7136 or me at (361) 972-8434.



J. J. Sheppard  
Vice President,  
Engineering &  
Technical Services

Attachments

- Attachment 1 Affidavit
- Attachment 2 Safety Analysis
- Attachment 3 Annotated Changes to Unit 1 License
- Attachment 4 Annotated Changes to Unit 2 License
- Attachment 5 Unit 1 License with Proposed Changes Incorporated
- Attachment 6 Unit 2 License with Proposed Changes Incorporated
- Attachment 7 Annotated Changes to STP Technical Specifications
- Attachment 8 STP Technical Specification Pages with Proposed Changes Incorporated

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ATTACHMENT 1

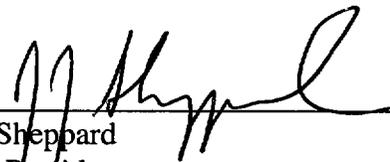
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
STP Nuclear Operating Company ) Docket Nos. 50-498  
 ) 50-499  
South Texas Project Units 1 and 2 )

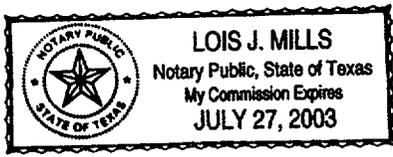
AFFIDAVIT

I, J. J. Sheppard, being duly sworn, hereby depose and say that I am Vice President, Engineering & Technical Services of STP Nuclear Operating Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed amendments to South Texas Project Operating Licenses NPF-76 and NPF-80; that I am familiar with the content thereof; and that the matters set forth therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
J. J. Sheppard  
Vice President,  
Engineering &  
Technical Services

STATE OF TEXAS )  
 )  
COUNTY OF MATAGORDA )

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 20<sup>th</sup> day of December, 2000.



  
\_\_\_\_\_  
Notary Public in and for the  
State of Texas

**ATTACHMENT 2**  
**SAFETY ANALYSIS**

## **SAFETY ANALYSIS**

### **1.0 INTRODUCTION**

1.1 The proposed change will delete Condition 2.G, "Reporting to the Commission," from the Facility Operating Licenses NPF-76 and NPF-80 for South Texas Project Units 1 and 2, and Specification 6.6.1.a, "Reportable Event Action," from the South Texas Project Technical Specifications.

### **1.2 ANNOTATED CHANGES TO THE EXISTING OPERATING LICENSES**

Unit 1	See Attachment 3
Unit 2	See Attachment 4

### **1.3 PROPOSED CHANGES INCORPORATED INTO THE OPERATING LICENSES**

Unit 1	See Attachment 5
Unit 2	See Attachment 6

### **1.4 ANNOTATED CHANGES TO THE EXISTING TECHNICAL SPECIFICATIONS**

Units 1 and 2	See Attachment 7
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### **1.5 PROPOSED CHANGES INCORPORATED INTO THE TECHNICAL SPECIFICATIONS**

Units 1 and 2	See Attachment 8
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### **1.6 FINAL SAFETY ANALYSIS REPORT (FSAR) SECTION**

The evaluations performed in support of this License Amendment Request do not result in any required changes to the FSAR per 10 CFR 50.71(e), the guidance provided by Regulatory Guide 1.181, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)," and NEI 98-03, "Guidelines for Updating Final Safety Analysis Reports."

## 2.0 DESCRIPTION

The proposed changes will delete Condition 2.G, "Reporting to the Commission," from the Operating Licenses for South Texas Project Units 1 and 2 and Specification 6.6.1.a, "Reportable Event Action," from the South Texas Project Technical Specifications.

## 3.0 BACKGROUND

Operating License Condition 2.G, "Reporting to the Commission," provides for initial notification with written follow-up of any violations of requirements contained in Condition 2.C of South Texas Project Facility Operating Licenses. Similarly, Specification 6.6.1.a, "Reportable Event Action," requires notification and a report submitted for all Reportable Events. The Nuclear Regulatory Commission's requirements for immediate notification with written follow-up requirements (Licensee Event Reports) of events at operating nuclear power reactors are stated in 10 CFR 50.72 and 10 CFR 50.73. Thus, the requirements of South Texas Project License Condition 2.G and Technical Specification 6.6.1.a are adequately governed by the requirements of 10 CFR 50.72 and 10 CFR 50.73.

This amendment request is comparable to the submittal by Beaver Valley Power dated October 15, 1998. The approved Beaver Valley Power License Amendments to Facility Operating License Numbers DPR-66 and NPF-73 were Amendments 220 and 97 respectively.

## 4.0 TECHNICAL ANALYSIS

License Condition 2.C lists requirements regarding Maximum Thermal Power, Technical Specifications, Antitrust, Initial Startup Test Program, Safety Parameter Display System (Unit 1 only), and Supplementary Containment Purge Isolation (Unit 1 only). Condition 2.G of the Operating License requires that STP notify the NRC of violations of the conditions in Condition 2.C within 24 hours and submit a report within 30 days. However, this is adequately addressed by the reporting requirements identified in 10 CFR 50.72 and 10 CFR 50.73. Consequently, Condition 2.G is not required.

Condition 2.G can be deleted for the following reasons:

- Deviations from the conditions regarding Maximum Thermal Power and Technical Specifications are adequately addressed by the requirements of 10 CFR 50.72 and 10 CFR 50.73.
- The condition regarding Antitrust is an administrative issue and has no safety significance. Consequently, it is not relevant to the proposed elimination of the reporting and notification requirements in Condition 2.G.

- Condition 2.C conditions regarding the Initial Startup Test Program, Safety Parameter Display System, and Supplementary Containment Purge Isolation address startup issues that have been resolved and are now historical. These conditions have no relevance to the proposed change in the reporting and notification requirements.

Specification 6.6.1.a requires that the Commission be notified and a report submitted pursuant to 10 CFR 50.73 for Reportable Events. Since the requirements for event notification and event reporting are delineated in 10 CFR 50.72 and 10 CFR 50.73, Specification 6.6.1.a is therefore redundant and may also be deleted.

These changes will have no impact on the design, function, or operation of any plant structure, system, or component, either technically or administratively nor will they have a programmatic effect on the South Texas Project Operational Quality Assurance Program.

## 5.0 REGULATORY ANALYSIS

### 5.1 NO SIGNIFICANT HAZARDS DETERMINATION

Pursuant to 10 CFR 50.92, it has been determined that this request involves no significant hazards considerations. The determination of no significant hazards was made by applying the Nuclear Regulatory Commission established standards contained in 10 CFR 50.92. These standards assure that any changes to the operation of South Texas Project in accordance with this request consider the following:

- 1) Will the change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

This request involves administrative changes only. No actual plant equipment or accident analyses will be affected by the proposed changes. Therefore, this request does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Will the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This request involves administrative changes only. No actual plant equipment or accident analyses will be affected by the proposed change and no failure modes

not bounded by previously evaluated accidents will be created. Therefore, this request does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3) Will the change involve a significant reduction in a margin of safety?

Response: No

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel and fuel cladding, Reactor Coolant System pressure boundary, and containment structure) to limit the level of radiation dose to the public. This request involves administrative changes only.

No actual plant equipment or accident analyses will be affected by the proposed change. Additionally, the proposed changes will not relax any criteria used to establish safety limits, will not relax any safety systems settings, or will not relax the bases for any limiting conditions of operation. Therefore, these proposed changes will not impact the margin of safety.

Conclusion

Based upon the analysis provided herein, the proposed amendments will not increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a reduction in a margin of safety. Therefore, the proposed amendments meet the requirements of 10 CFR 50.92 and do not involve a significant hazards consideration.

5.2 REGULATORY SAFETY ANALYSIS

Current Applicable Regulatory Requirements/Criteria

10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors"

10 CFR 50.73, "Licensee event report system", (a) *reportable events*. (1) The holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after the discovery of the event. Unless otherwise specified in this section, the licensee shall report an event regardless of the plant mode or power level, and regardless of the significance of the structure, system, or component that initiated the event.

### Pending Applicable Regulatory Requirements/Criteria

10 CFR 50.72: "Immediate notification requirements for operating nuclear power reactors" (as amended).

10 CFR 50.73(a) **Reportable events.** (1) The holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 60 days after the discovery of the event. In the case of an invalid actuation reported under § 50.73(a)(2)(iv), other than actuation of the reactor protection system (RPS) when the reactor is critical, the licensee may, at its option, provide a telephone notification to the NRC Operations Center within 60 days after discovery of the event instead of submitting a written LER. Unless otherwise specified in this section, the licensee shall report an event if it occurred within three years of the date of discovery regardless of the plant mode or power level, and regardless of the significance of the structure, system, or component that initiated the event.

### Analysis

Condition 2.C lists requirements regarding Maximum Thermal Power, Technical Specifications, Antitrust, Initial Startup Test Program, Safety Parameter Display System (Unit 1 only), and Supplementary Containment Purge Isolation (Unit 1 only). Condition 2.G of the Operating License requires that STP notify the NRC of violations of the conditions in Condition 2.C within 24 hours and submit a report within 30 days. However, this is adequately addressed by the reporting requirements identified in 10 CFR 50.72 and 10 CFR 50.73. Consequently, Condition 2.G is not required.

Deviations from the conditions regarding Maximum Thermal Power and Technical Specifications are adequately governed by the requirements of 10 CFR 50.72 and 10 CFR 50.73.

The condition regarding Antitrust is an administrative issue and has no safety significance. Consequently, it is not relevant to the proposed elimination of the reporting and notification requirements in Condition 2.G.

Condition 2.C conditions regarding the Initial Startup Test Program, Safety Parameter Display System, and Supplementary Containment Purge Isolation address startup issues that have been resolved and are now historical. These conditions have no relevance to the proposed change in the reporting and notification requirements.

Specification 6.6.1.a requires that the Commission be notified and a report submitted pursuant to 10 CFR 50.73 for Reportable Events. Since the requirements for event

notification and event reporting are delineated in 10 CFR 50.72 and 10 CFR 50.73, Specification 6.6.1.a is therefore redundant and may also be deleted.

The proposed changes will reduce unnecessary regulatory burden and will allow STP to take advantage of the pending revision to 10 CFR 50.73 that allows for Licensee Event Reports to be submitted within 60 days instead of 30 days as required by the current Condition 2.G.

### Conclusion

These changes are consistent with the changes forthcoming in 10 CFR 50.72 and 10 CFR 50.73.

## **6.0 ENVIRONMENTAL EVALUATION**

Pursuant to 10 CFR 51.22, an evaluation of this request has been performed to determine whether or not it meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10) of the regulations.

This request will have no adverse radiation impact upon the environment. It has been determined that the proposed changes involve:

1. No significant hazards consideration,
2. No significant change in the types, or significant increase in the amounts, of any effluents that may be released offsite, and
3. No significant increase in individual or cumulative occupational radiation exposures.

Therefore, this request for revision of the Facility Operating Licenses meets the criteria of 10 CFR 51.22 for categorical exclusion from the requirement for an environmental assessment.

## **7.0 REFERENCES**

- 1.0 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors"
- 2.0 10 CFR 50.73, "Licensee event report system"
- 3.0 Letter from Sushil C. Jain, Duquesne Light Company (Beaver Valley Power Station), to U.S. Nuclear Regulatory Commission dated October 15, 1998.

## **8.0 PRECEDENTS**

There is a precedent for allowing deletion of Condition 2.G, "Reporting to the Commission," from Facility Operating Licenses. The Duquesne Light Company operating licenses for Beaver Valley Power Station, Units 1 and 2 (Facility Operating License Numbers DPR-66 and NPF-73) have been amended to delete this Condition via Amendments 220 and 97 respectively.

End of Attachment 2

**ATTACHMENT 3**

**ANNOTATED CHANGES TO UNIT 1 LICENSE**

**NO CHANGES TO THIS PAGE NO CHANGES TO THIS PAGE**

SOUTH TEXAS LICENSE

-3-

- (1) STPNOC pursuant to Section 103 of the Act and 10 CFR Part 50, to possess, use and operate the facility at the designated location in Matagorda County, Texas, in accordance with the procedures and limitations set forth in this license;
  - (2) Houston Lighting & Power Company (HL&P), the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and the City of Austin, Texas (COA), pursuant to the Act and 10 CFR Part 50, to possess the facility at the designated location in Matagorda County, Texas, in accordance with the procedures and limitations set forth in this license;
  - (3) STPNOC, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
  - (4) STPNOC, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
  - (5) STPNOC, pursuant to the Act and 10 CFR Parts 30, 49 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
  - (6) STPNOC, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility authorized herein.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

STPNOC is authorized to operate the facility at reactor core power levels not in excess of 3800 megawatts thermal (100% power) in accordance with the conditions specified herein.

**NO CHANGES TO THIS PAGE NO CHANGES TO THIS PAGE**

SOUTH TEXAS LICENSE

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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 93, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

Houston Lighting & Power Company, City Public Service Board of San Antonio, Central Power and Light Company and City of Austin, Texas (the "Owners") shall comply with the antitrust conditions delineated in Appendix C to this license; Appendix C is hereby incorporated into this license.

STPNOC shall not market or broker power or energy from South Texas Project Unit 1. The Owners are responsible and accountable for the actions of STPNOC to the extent that said actions affect the marketing or brokering of power or energy from South Texas Project Unit 1 and, in any way, contravene the antitrust conditions of this paragraph or Appendix C of this license.

(4) Initial Startup Test Program (Section 14, SER)\*

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

(5) Safety Parameter Display System (Section 18, SSER No. 4)\*

Before startup after the first refueling outage, HL&P[\*\*] shall perform the necessary activities, provide acceptable responses, and implement all proposed corrective actions related to issues as described in Section 18.2 of SER Supplement 4.

(6) Supplementary Containment Purge Isolation (Section 11.5. SSER No. 4)

HL&P shall provide, prior to startup from the first refueling outage, control room indication of the normal and supplemental containment purge sample line isolation valve position.

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\* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

\*\* The original licensee authorized to possess, use and operate the facility was HL&P. Consequently, historical references to certain obligations of HL&P remain in the license conditions.

E. Fire Protection

STPNOC shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report through Amendment No. 55 and the Fire Hazards Analysis Report through Amendment No. 7, and submittals dated April 29, May 7, 8 and 29, June 11, 25 and 26, 1987, and as approved in the SER (NUREG-0781) dated April 1986 and its Supplements, subject to the following provision:

STPNOC may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

F. Physical Security

STPNOC shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority under 10 CFR 50.90 and 10 CFR 50.54(p).

The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "South Texas Project Electric Generating Station Physical Security Plan," with revisions/amendments submitted through March 4, 1988; "South Texas Project Electric Generating Station Security Personnel Qualification and Training Plan" with revisions submitted through March 4, 1988, and "South Texas Project Electric Generating Station Safeguards Contingency Plan," with revisions/amendments submitted through July 24, 1987.

G. Reporting To The Commission ~~Not Used~~

~~Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, STPNOC shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within twenty four (24) hours to the NRC Operations Center via the Emergency Notification System with written follow up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).~~

H. Financial Protection

The owners shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

ATTACHMENT 4

ANNOTATED CHANGES TO UNIT 2 LICENSE

**NO CHANGES TO THIS PAGE NO CHANGES TO THIS PAGE**

-3-

- (1) STPNOC pursuant to Section 103 of the Act and 10 CFR Part 50, to possess, use and operate the facility at the designated location in Matagorda County, Texas, in accordance with the procedures and limitations set forth in this license;
  - (2) Houston Lighting & Power Company (HL&P), the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and the City of Austin, Texas (COA), pursuant to the Act and 10 CFR Part 50, to possess the facility at the designated location in Matagorda County, Texas, in accordance with the procedures and limitations set forth in this license;
  - (3) STPNOC, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
  - (4) STPNOC, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
  - (5) STPNOC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
  - (6) STPNOC, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility authorized herein.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

STPNOC is authorized to operate the facility at reactor core power levels not in excess of 3800 megawatts thermal (100% power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 80, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

Houston Lighting & Power Company, City Public Service Board of San Antonio, Central Power and Light Company and City of Austin, Texas (the "Owners") shall comply with the antitrust conditions delineated in Appendix C to this license; Appendix C is hereby incorporated into this license.

STPNOC shall not market or broker power or energy from South Texas Project Unit 2. The Owners are responsible and accountable for the actions of STPNOC to the extent that said actions affect the marketing or brokering of power or energy from South Texas Project Unit 2 and, in any way, contravene the antitrust conditions of this paragraph or Appendix C of this license.

(4) Initial Startup Test Program (Section 14, SR)\*

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

D. Exemptions

The following exemptions are authorized by law and will not endanger life or property or the common defense and security, and certain special circumstances are present. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- (1) The facility requires a technical exemption from the requirements of 10 CFR Part 50, Appendix J, Section III.D.2(b)(ii). The justification for this exemption is contained in Section 6.2.6 of Supplement 3 to the Safety Evaluation Report. The staff's environmental assessment was published on December 16, 1986 (53 FR 50605). Therefore, pursuant to 10 CFR 50.12(a)(1),

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\* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority under 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "South Texas Project Electric Generating Station Physical Security Plan," with revision/amendments submitted through September 30, 1988; "South Texas Project Electric Generating Station Security Personnel Qualification and Training Plan" with revisions submitted through March 4, 1988, and "South Texas Project Electric Generating Station Safeguards Contingency Plan," with revisions/amendments submitted through July 19, 1988.

G. Reporting To The Commission Not Used

~~Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, STPNOC shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within twenty four (24) hours to the NRC Operations Center via the Emergency Notification System with written follow up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).~~

H. Financial Protection

The Owners shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

I. Effective date and Expiration

This license is effective as of the date of issuance and shall expire at midnight on December 15, 2028.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By: James H. Sniezek/for

Thomas E. Murley, Director

Office of Nuclear Reactor Regulation

Enclosures:

1. Appendix A, Technical Specifications (NUREG-1346)
2. Appendix B, Environmental Protection Plan
3. Appendix C, Antitrust Conditions

Date of Issuance: March 28, 1989

Amendment No. 80

**ATTACHMENT 5**

**UNIT 1 LICENSE WITH PROPOSED CHANGES INCORPORATED**

E. Fire Protection

STPNOC shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report through Amendment No. 55 and the Fire Hazards Analysis Report through Amendment No. 7, and submittals dated April 29, May 7, 8 and 29, June 11, 25 and 26, 1987, and as approved in the SER (NUREG-0781) dated April 1986 and its Supplements, subject to the following provision:

STPNOC may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

F. Physical Security

STPNOC shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority under 10 CFR 50.90 and 10 CFR 50.54(p).

The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "South Texas Project Electric Generating Station Physical Security Plan," with revisions/amendments submitted through March 4, 1988; "South Texas Project Electric Generating Station Security Personnel Qualification and Training Plan" with revisions submitted through March 4, 1988, and "South Texas Project Electric Generating Station Safeguards Contingency Plan," with revisions/amendments submitted through July 24, 1987.

G. Not Used

H. Financial Protection

The owners shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

**ATTACHMENT 6**

**UNIT 2 LICENSE WITH PROPOSED CHANGES INCORPORATED**

contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority under 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "South Texas Project Electric Generating Station Physical Security Plan," with revision/amendments submitted through September 30, 1988; "South Texas Project Electric Generating Station Security Personnel Qualification and Training Plan" with revisions submitted through March 4, 1988, and "South Texas Project Electric Generating Station Safeguards Contingency Plan," with revisions/amendments submitted through July 19, 1988.

G. Not Used

H. Financial Protection

The Owners shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

I. Effective date and Expiration

This license is effective as of the date of issuance and shall expire at midnight on December 15, 2028.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By: James H. Sniezek/for

Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation

Enclosures:

1. Appendix A, Technical Specifications (NUREG-1346)
2. Appendix B, Environmental Protection Plan
3. Appendix C, Antitrust Conditions

Date of Issuance: March 28, 1989

Amendment No. 80,

**ATTACHMENT 7**

**ANNOTATED CHANGES TO STP TECHNICAL SPECIFICATIONS**

## ADMINISTRATIVE CONTROLS

### ACTIVITIES (Continued)

at least one of whom holds a Senior Reactor Operator's License. Changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure prior to implementation of the change.

- b. Proposed changes or modifications to safety-related structures, systems, and components shall be reviewed as designated by the Plant Manager. Each such modification shall be reviewed by an individual/group other than the individual/group who designed the modification, but who may be from the same organization as the individual/group who designed the modification. Proposed modifications to safety-related structures, systems, and components shall be approved by the Plant Manager prior to implementation.
- c. Proposed tests and experiments that affect nuclear safety and that are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved prior to implementation. Each such test or experiment shall be reviewed by an individual/group other than the individual/group who prepared the test or experiment but who may be from the same organization as the individual/group who prepared the test or experiment. Proposed tests and experiments shall be approved by the Plant Manager.
- d. Individuals responsible for reviews performed in accordance with Specification 6.5.3.1 (a) through (c) shall be members of the plant management staff previously designated by the Plant Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving an unreviewed safety question will be obtained prior to Plant Manager approval for implementation.

6.5.3.2 Records of the above activities shall be provided to the Plant Manager, PORC, and/or NSRB as necessary for required reviews.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. ~~The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and~~ **Not Used!**
- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NSRB and the President and Chief Executive Officer.

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

**ATTACHMENT 8**

**STP TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES  
INCORPORATED**

## ADMINISTRATIVE CONTROLS

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### ACTIVITIES (Continued)

at least one of whom holds a Senior Reactor Operator's License. Changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure prior to implementation of the change.

- b. Proposed changes or modifications to safety-related structures, systems, and components shall be reviewed as designated by the Plant Manager. Each such modification shall be reviewed by an individual/group other than the individual/group who designed the modification, but who may be from the same organization as the individual/group who designed the modification. Proposed modifications to safety-related structures, systems, and components shall be approved by the Plant Manager prior to implementation.
- c. Proposed tests and experiments that affect nuclear safety and that are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved prior to implementation. Each such test or experiment shall be reviewed by an individual/group other than the individual/group who prepared the test or experiment but who may be from the same organization as the individual/group who prepared the test or experiment. Proposed tests and experiments shall be approved by the Plant Manager.
- d. Individuals responsible for reviews performed in accordance with Specification 6.5.3.1 (a) through (c) shall be members of the plant management staff previously designated by the Plant Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving an unreviewed safety question will be obtained prior to Plant Manager approval for implementation.

6.5.3.2 Records of the above activities shall be provided to the Plant Manager, PORC, and/or NSRB as necessary for required reviews.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. Not Used.
- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NRSB and the President and Chief Executive Officer.

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated: