

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

December 27, 2000 NOC-AE-00000985 File No.: G09.06 STI 31217487 10CFR50.36

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 Change to the Bases for Technical Specification 3/4.7.8

STPNOC has revised the Bases for the South Texas Project Technical Specifications in accordance with 10CFR50.59. The changes to the Bases clarify how the specification applies to situations where the Fuel Handling Building ventilation exhaust subsystem and the ventilation filtration subsystem both have one or more inoperable trains.

The revised pages and replacement instructions are provided so that the NRC can update their copies of the Bases.

If there are any questions regarding these changes, please contact Mr. A. W. Harrison at 361-972-7298.

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M. A. McBurnett Director, Quality & Licensing

AWH/

Attachments:

- 1. Page replacement instructions
- 2. Revised Bases Pages



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Attachment 1

# Page Replacement Instructions

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Remove	Insert
B 3/4 7-5	B 3/4 7-5

Attachment 2

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**Revised Bases Page** 

#### PLANT SYSTEMS

#### BASES

The compensatory action may include placing fans in pull-to-lock as necessary to preclude there being a motive force to transport contaminated air to a clean environment in the event of an accident.\_These compensatory actions also include administrative controls on opening plenums or other openings such that appropriate communication is established with the control room to assure timely closing of the system if necessary. Since the Control Room Envelope boundary integrity also affects operability of the overall system, entry and exit is administratively controlled. Administrative control of entry and exit through doors is performed by the person(s) entering or exiting the area. Extended opening of the boundary is coordinated with the control room with appropriate plans for closure and communication.

### B 3/4.7.8 FUEL HANDLING BUILDING EXHAUST AIR SYSTEM

The FHB exhaust air system is comprised of two independent exhaust air filter trains and three exhaust ventilation trains. Each of the three exhaust ventilation trains has a main exhaust fan, an exhaust booster fan, and associated dampers. The main exhaust fans share a common plenum and the exhaust booster fans share a common plenum. An OPERABLE ventilation exhaust train consists of any OPERABLE main exhaust fan, any OPERABLE exhaust booster fan, and appropriate dampers.

The OPERABILITY of the Fuel Handling Building Exhaust Air System ensures that radioactive materials leaking from the ECCS equipment within the FHB following a LOCA are filtered prior to reaching the environment. Operation of the system with the heaters operating for the least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing

The time limits associated with the ACTIONS to restore an inoperable train to OPERABLE status are consistent with the redundancy and capability of the system and the low probability of a design basis accident while the affected trains(s) is out of service. The allowed outage time for one train of FHB exhaust ventilation or one exhaust filtration train being inoperable, or a combination of an inoperable exhaust ventilation train and an inoperable exhaust filtration train is 7 days. With more than one inoperable train of either FHB exhaust filtration or FHB exhaust ventilation, or with combinations involving more than one inoperable train of either the exhaust ventilation or the exhaust filtration, the allowed outage time is 12 hours. A limited allowed outage time of 12 hours is allowed for multiple trains to be out of service simultaneously in recognition of the fact that there are common plenums and some maintenance or testing activities required opening or entry into these common plenums. This time is reasonable to diagnose, plan, and possibly repair problems with the boundary or the ventilation system. This is acceptable based on the low probability of a design basis event in that brief allowed outage time and because administrative controls impose compensatory actions that reduce the already small risk associated with being in the ACTION. The compensatory actions are consistent with the intent of GDC 19, GDC 60 and Part 100 to protect plant personnel and the public from potential hazards such as radioactive contamination, smoke, and temperature, etc. Pre-planned measures should be available to address these concerns for intentional and unintentional entry into the condition. The compensatory action may include placing fans in pull-to-lock as necessary to preclude there being a motive force to transport contaminated air to a clean environment in the event of an accident. These compensatory actions include administrative controls on opening plenums or other openings such that appropriate communication is established with the control room to assure timely closing of the system if necessary. Since the Fuel Handling Building boundary integrity also affects operability of the overall system, entry and exit is administratively controlled. Administrative control of entry and exit through doors is performed by the person(s) entering or exiting the area. Extended opening of the boundary is coordinated with the control room with appropriate plans for closure and communication.

B 3/4.7.9 (Not Used)

SOUTH TEXAS - UNITS 1 & 2 B 3/4 7-5

Unit 1 - Amendment No. <del>19, 109(MAY 17, 1999)</del>, <del>125</del> Unit 2 - Amendment No. <del>9, 96, 100</del>, <del>113</del> 00-18934