Nuclear Operating Company

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

August 2, 2001
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10CFR50.90
10CFR50.54(q)
10CFR50.34(f)

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
Application for Amendment to Administrative Control Technical Specifications 6.8.3.a, "Primary Coolant Sources Outside Containment," and 6.8.3.d, "Post-Accident Sampling"

Pursuant to 10CFR50.90, the South Texas Project requests Nuclear Regulatory Commission approval of a proposed license amendment to the Unit 1 and Unit 2 Technical Specifications.

The South Texas Project proposes to revise Technical Specification 6.8.3.a, "Primary Coolant Sources Outside Containment," and 6.8.3.d, "Post-Accident Sampling." The Post-Accident Sampling System is to be removed from service, with attendant changes to procedures and functions that depend upon input from the Post-Accident Sampling System. The changes are consistent with NRC-approved Industry/Technical Specification Task Force Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)."

Attachment 1 describes the plant-specific changes proposed for the South Texas Project, as well as the bases and justification to support them.

The South Texas Project submits this application as an applicant in the consolidated line item improvement process. This proposal is prepared in accordance with the model NRC Safety Evaluation relating to elimination of requirements for post-accident sampling as proposed by WCAP-14986, "Westinghouse Owners Group Post Accident Sampling System Requirements: A Technical Basis." The Nuclear Regulatory Commission has reviewed and approved WCAP-14986 as indicated by the Safety Evaluation issued June 14, 2000.

The South Texas Project Plant Operations Review Committee has reviewed the proposed amendment and recommended it for approval. The South Texas Project Nuclear Safety Review Board has reviewed and approved the proposed change.

The required affidavit, the Description and Assessment of the proposed change, the proposed Technical Specification replacement pages, and commitments are included as attachments to this letter.

In accordance with 10CFR50.91(b), the South Texas Project is providing the State of Texas with a copy of this proposed amendment.

The proposed changes will not have an adverse impact on the health and well-being of the public.

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The South Texas Project requests Nuclear Regulatory Commission approval of these proposed changes by January 31, 2002.

If there are any questions, please contact either Mr. P. L. Walker at (361) 972-8392 or me at (361) 972-8757.

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

PLW
Attachments:
1) Affidavit
2) Description and Assessment
3) Proposed Technical Specification Changes
4) Revised Technical Specification Pages
5) List of Commitments

cc:

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

ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
STP Nuclear Operating Company, et al.,	)	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 license amendment; 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 2nd day of August, 2001.

LOIS J. MILLS
Notary Public, State of Texas
My Commission Expires
JULY 27, 2003

Notary Public in and for the
State of Texas

ATTACHMENT 2

DESCRIPTION AND ASSESSMENT

SOUTH TEXAS PROJECT
UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATION CHANGE TO REMOVE THE POST-ACCIDENT SAMPLING SYSTEM FROM SERVICE

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

1.1 Proposed Change

This proposed License Amendment Request is a request pursuant to 10CFR50.90 to revise Technical Specification 6.8.3.a, "Primary Coolant Sources Outside Containment," and 6.8.3.d, "Post-Accident Sampling," consistent with removing the Post-Accident Sampling System (PASS) from service.

1.2 Proposed Technical Specification Changes

See Attachment 3.

1.3 Revised Technical Specifications

See Attachment 4.

1.4 Updated Final Safety Analysis Report

Implementation of the change proposed by this amendment request will require revision of the South Texas Project Updated Final Safety Analysis Report and the Emergency Plan.

2.0 BACKGROUND

Westinghouse Owners Group (WOG) topical report WCAP-14986-A Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

3.0 DESCRIPTION OF THE PROPOSED CHANGE

South Texas Project Technical Specification 6.8.3.a, "Primary Coolant Sources Outside Containment," states that a program shall be established, implemented, and maintained:

> ... to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the containment spray, Safety Injection, containment hydrogen monitoring, post-accident sampling and primary sampling. The program shall include the following:
>
> 1) Preventive maintenance and periodic visual inspection requirements, and
>
> 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

South Texas Project Technical Specification 6.8.3.d, "Post-Accident Sampling," states that a program shall be established, implemented, and maintained:

> ... which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:
>
> 1) Training of personnel,
>
> 2) Procedures for sampling and analysis, and
>
> 3) Provisions for maintenance of sampling and analysis equipment.

The reference to post-accident sampling is to be removed from 6.8.3.a, and 6.8.3.d is to be deleted altogether.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366 (Reference 1). Availability of this technical specification improvement was announced in Federal Register Volume 65, No. 211 (Reference 2), on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

4.0 TECHNICAL ANALYSIS

4.1 Applicability of Published Safety Evaluation

The South Texas Project has reviewed the safety evaluation published as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000). The review included the NRC safety evaluation of WCAP-14986. The South Texas Project has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the South Texas Project, and justify this amendment incorporating the proposed changes to the South Texas Project Technical Specifications.

4.2 Optional Changes and Variations

The South Texas Project is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or in the NRC staff's model safety evaluation published in the Federal Register October 31, 2000.

The South Texas Project Technical Specifications include an administrative requirement for a program for those portions of systems outside containment which contain highly radioactive fluids to minimize leakage during a serious transient or accident. PASS is specifically listed in Technical Specification 6.8.3.a as falling under the scope of this requirement. As described in the staff's model safety evaluation published on October 31, 2000, the South Texas Project proposes to implement the appropriate controls such that PASS will not be a potential leakage path for highly radioactive fluids outside containment. These controls will be applied during the implementation period for this amendment

such that it is appropriate to delete reference to PASS from Technical Specification 6.8.3.a.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

The South Texas Project has reviewed the safety evaluation published as part of the CLIIP. The South Texas Project has concluded that the proposed determination presented in the notice is applicable to the South Texas Project and there are no significant hazards associated with this change. The determination is hereby incorporated by reference to satisfy the requirements of 10CFR50.91(a).

5.2 Verification and Commitments

Pursuant to the notice of availability published in the Federal Register (Reference 2) for this technical specification amendment request, the South Texas Project has addressed the following plant-specific verifications and commitments:

1. The South Texas Project will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be maintained in the plant procedures. Maintaining the contingency plans is considered a regulatory commitment. Implementation is expected within six months following NRC approval of the proposed change.

2. The South Texas Project has developed a capability for classifying fuel damage events at the Alert level threshold for 2 – 5% core damage. This level of core damage is associated with radioactivity levels of 300 μCi/ml dose equivalent iodine. This capability for the Alert classification will be maintained in emergency plan implementing procedures. Maintaining the capability of classifying fuel damage events is considered a regulatory commitment. Implementation is expected within six months following NRC approval of the proposed change.

3. The South Texas Project has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is maintained in the emergency plan implementing procedures. Maintaining the capability to monitor such radioactive iodines is considered a regulatory commitment.

5.3 Implementation

The South Texas Project requests NRC approval of this proposed Technical Specification change by January 31, 2002. Implementation is expected within six months following NRC approval of the proposed change.

6.0 ENVIRONMENTAL EVALUATION

The South Texas Project has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIIP. The South

Texas Project has determined that the staff's findings presented in that evaluation are applicable to the South Texas Project and the evaluation is incorporated by reference.

7.0 REFERENCES

1. Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis, July 2000
2. Industry/TSTF Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)"
3. Federal Register, Volume 65, Number 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process," dated October 31, 2000

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION CHANGES

SAFETY LIMIT VIOLATION (Continued)

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The President and Chief Executive Officer and the NSRB shall be notified within 24 hours;

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe: (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence;

c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB, and the President and Chief Executive Officer within 14 days of the violation; and

d. Operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;

c. Security Plan implementation;

d. Emergency Plan implementation;

e. PROCESS CONTROL PROGRAM implementation;

f. OFFSITE DOSE CALCULATION MANUAL implementation;

g. Quality Assurance Program for effluent and environmental monitoring; and

h. Fire Protection Program implementation.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved prior to implementation and reviewed periodically as set forth in Specification 6.5.3 and administrative procedures.

6.8.3 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the containment spray, Safety Injection, containment hydrogen monitoring, ~~post-accident sampling~~ and primary sampling. The program shall include the following:

PROCEDURES AND PROGRAMS (Continued)

1) Preventive maintenance and periodic visual inspection requirements, and

2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1) Training of personnel,

2) Procedures for monitoring, and

3) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

1) Identification of a sampling schedule for the critical variables and control points for these variables,

2) Identification of the procedures used to measure the values of the critical variables,

3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,

4) Procedures for the recording and management of data,

5) Procedures defining corrective actions for all off-control point chemistry conditions, and

6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. ~~Post-Accident Sampling~~ Not used

~~A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:~~

~~1) Training of personnel,~~

~~2) Procedures for sampling and analysis, and~~

~~3) Provisions for maintenance of sampling and analysis equipment.~~

ATTACHMENT 4

REVISED TECHNICAL SPECIFICATION PAGES

SAFETY LIMIT VIOLATION (Continued)

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The President and Chief Executive Officer and the NSRB shall be notified within 24 hours;

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe: (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence;

c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB, and the President and Chief Executive Officer within 14 days of the violation; and

d. Operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;

c. Security Plan implementation;

d. Emergency Plan implementation;

e. PROCESS CONTROL PROGRAM implementation;

f. OFFSITE DOSE CALCULATION MANUAL implementation;

g. Quality Assurance Program for effluent and environmental monitoring; and

h. Fire Protection Program implementation.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved prior to implementation and reviewed periodically as set forth in Specification 6.5.3 and administrative procedures.

6.8.3 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the containment spray, Safety Injection, containment hydrogen monitoring, and primary sampling. The program shall include the following:

PROCEDURES AND PROGRAMS (Continued)

1) Preventive maintenance and periodic visual inspection requirements, and
2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1) Training of personnel,
2) Procedures for monitoring, and
3) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

1) Identification of a sampling schedule for the critical variables and control points for these variables,
2) Identification of the procedures used to measure the values of the critical variables,
3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,
4) Procedures for the recording and management of data,
5) Procedures defining corrective actions for all off-control point chemistry conditions, and
6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Not used

LIST OF COMMITMENTS

The following table identifies those actions in this license amendment request that are required for the South Texas Project. Other statements in this submittal are provided for informational purposes and are not considered to be commitments. If there are any questions regarding these commitments, please contact Mr. P. L. Walker at (361) 972-8392.

COMMITMENT	IMPLEMENTATION
The South Texas Project will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be maintained in plant procedures. Maintaining the contingency plans is considered a regulatory commitment.	Within six months following NRC approval
The South Texas Project has developed a capability for classifying fuel damage events at the Alert level threshold for 2 – 5% core damage. This level of core damage is associated with radioactivity levels of 300 μCi/ml dose equivalent iodine. The capability for the Alert classification will be described in emergency plan implementing procedures. Maintaining the capability to classify fuel damage events is considered a regulatory commitment.	Within six months following NRC approval
The South Texas Project has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in the emergency plan implementing procedures. Maintaining the capability to monitor radioactive iodines is considered a regulatory commitment.	Completed