



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

September 23, 2001
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File No.: G25
10CFR50.36
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Unit 1
Docket No. STN 50-498
Request for Enforcement Discretion from
Technical Specification 3.7.4, "Essential Cooling Water System"
And Associated Supported Systems Limiting Condition for Operation Action Statements

On September 21, 2001, at approximately 2106 hours, Unit 1 experienced an unexpected loss of discharge pressure from the Train C Essential Cooling Water pump during post-maintenance testing. The pump was immediately secured. The cause of the loss of discharge pressure was a seizure of the center shaft bearing due to a lack of cooling and lubrication water. Efforts are currently in progress to effect necessary repairs and return the pump to service. The Action Statement for Technical Specification 3.7.4 requires that three trains of Essential Cooling Water be restored to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. The Allowed Outage Time for the Train C Essential Cooling Water pump was entered on September 17, 2001 at 0200 hours and expires on September 24, 2001 at 0200 hours. It is anticipated that an additional 5 days, or a total allowed outage time of 12 days, may be required to complete repairs and testing to restore the Train C Essential Cooling Water system to OPERABLE status.

The South Texas Project requests enforcement discretion from the requirements of the Action Statements for Technical Specifications 3.7.4, "Essential Cooling Water," and the associated Technical Specifications for those systems supported by Essential Cooling Water, for an additional 5 days, on a one-time basis, for Unit 1 to facilitate repairs to the Train C Essential Cooling Water pump.

The attachment provides the information supporting a request for enforcement discretion as required by the Nuclear Regulatory Commission's Inspection Manual (Part 9900 - Technical Guidance), "Operations - Notices of Enforcement Discretion." The information contained in the attachment to this document supports that the health and safety of the public will be protected with this enforcement discretion.

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We believe the attached information shows there is no increase in radiological risk in accordance with the requirements of Part 9900 of the NRC Inspection Manual.

STP has reviewed recent Notices of Enforcement Discretion granted to Grand Gulf and Fermi Unit 2, to ensure consistency with the associated utility requests.

If you should have any questions concerning this matter please contact either S. M. Head at (361) 972-7136 or J. R. Lovell at (361) 972-7799.


G. L. Parkey 
Plant General Manager

Attachment: Information Pursuant To The Nuclear Regulatory Commission's Inspection Manual (Part 9900 - Technical Guidance), "Operations - Notices of Enforcement Discretion."

Figure 1: Essential Cooling Water Pump Diagram

cc:

Ellis W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Mohan C. Thadani
Addressee Only
U. S. Nuclear Regulatory Commission
Project Manager, Mail Stop OWFN/7-D-1
Washington, DC 20555-0001

Cornelius F. O'Keefe
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code MN116
Wadsworth, TX 77483

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius
1800 M. Street, N.W.
Washington, DC 20036-5869

M. T. Hardt/W. C. Gunst
City Public Service
P. O. Box 1771
San Antonio, TX 78296

A. Ramirez/C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Jon C. Wood
Matthews & Branscomb
112 East Pecan, Suite 1100
San Antonio, Texas 78205-3692

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

R. L. Balcom/D. G. Tees
Reliant Energy, Inc.
P. O. Box 1700
Houston, TX 77251

C. A. Johnson/R. P. Powers
AEP - Central Power and Light Company
P. O. Box 289, Mail Code: N5022
Wadsworth, TX 77483

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Washington, D.C. 20555-0001

Information Pursuant to the Nuclear Regulatory Commission's Inspection Manual (Part 9900 - Technical Guidance), "Operations - Notices of Enforcement Discretion."

1) **The Technical Specification or other license conditions that will be violated.**

The South Texas Project specifically requests Enforcement Discretion from the shutdown requirement of the ACTION Statement of Technical Specification 3.7.4, "Essential Cooling Water System," which requires:

"With only two essential cooling water loops OPERABLE, restore at least three loops to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Additionally, Enforcement Discretion is also requested from the ACTION Statement shutdown requirements of the Technical Specifications associated with the systems supported by Essential Cooling Water. These are:

Technical Specification 3.5.2, "ECCS Subsystems - T_{avg} Greater Than or Equal To 350 °F," ACTION a

"With less than the above subsystems OPERABLE, but with at least two High Head Safety Injection pumps in an OPERABLE status, two Low Head Safety Injection pumps and associated RHR heat exchangers in an OPERABLE status, and sufficient flow paths to accommodate these OPERABLE Safety Injection Pumps and RHR heat exchangers, restore the inoperable subsystem(s) to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours."

Technical Specification 3.5.6, "Residual Heat Removal (RHR) System," ACTION a

"With one RHR loop inoperable, restore the required loop to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours."

Technical Specification 3.6.2.1, "Containment Spray System"

"With one Containment Spray System inoperable, restore the inoperable Spray System to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours; restore the inoperable Spray System to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours."

Technical Specification 3.6.2.3, "Containment Cooling System"

"With one group of the above required Reactor Containment Fan Coolers inoperable, restore the inoperable group of RCFC to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Technical Specification 3.7.3, "Component Cooling Water System"

"With only two component cooling water loops OPERABLE, restore at least three loops to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Technical Specification 3.7.7, "Control Room Makeup and Cleanup Filtration System"

"With one Control Room Makeup and Cleanup Filtration System inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Technical Specification 3.7.14, "Essential Chilled Water"

"With only two Essential Chilled Water System loops OPERABLE, restore three loops to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

The South Texas Project requests with regards to the above ACTION Statements, an extension of the 7 day Allowed Outage Times to a total of 12 days.

2) **The circumstance surrounding the situation, including root causes, the need for prompt action, and identification of any relevant historical events.**

System Description:

The ECW system consists of three 50-percent capacity trains and provides cooling required for safety-related components during and after any design-basis accident such as a loss of coolant accident, loss of offsite power, or a safe shutdown earthquake. Additionally, the ECW system functions during normal operation and other non-emergency operating modes to transfer heat loads from service equipment to the essential cooling pond. The ECW system provides cooling water to the following components during all emergency and non-emergency modes of operation:

- Standby Diesel Generator Inter-cooler
- Standby Diesel Generator Auxiliary Equipment Skid Coolers
- Essential HVAC Chillers (TS 3.7.14), which support the following:
 - Emergency Core Cooling System (TS 3.5.2)
 - Containment Spray System (TS 3.6.2.1)
 - Control Room Cleanup and Filtration (TS 3.7.7)
- Component Cooling Water Pump Supplementary Cooler
- Component Cooling Water Heat Exchanger (TS 3.7.3), which supports the following:
 - Emergency Core Cooling System (TS 3.5.2)
 - Residual Heat Removal System (TS 3.5.6)
 - Reactor Containment Fan Coolers (TS 3.6.2.3)

Circumstances surrounding the current situation:

Unit 1 is in Mode 1 at approximately 94% power in coastdown operations in preparation for the upcoming refueling outage. The Train C Essential Cooling Water (ECW) system outage was entered on September 17, 2001 at 0200 hours in order to perform scheduled maintenance. On September 21, 2001, at approximately 2106 hours, the Train C ECW pump was started in order to perform post-maintenance surveillance testing. Following pump start, an unexpected sudden decrease in indicated discharge pressure to approximately zero psig was observed, and the pump was immediately secured. During shutdown of the pump, the pump shaft was observed to come to an abrupt stop.

The pump has been disassembled. It has been determined that the cause for the failure of the pump to generate the required discharge head was a seizure of the center shaft bearing due to a lack of cooling and lubrication water. The root cause of the insufficient cooling and lubrication flow was due to foreign material blocking or obstructing the bearing flow orifices. This lack of cooling caused significant bearing and pump shaft heating. This

heating resulted in thermal expansion of the bearing and shaft, which caused the shaft to bind in the shaft casing. Refer to Figure 1, which provides a diagram of an Essential Cooling Water pump.

In order to ensure proper cooling and bearing lubrication, additional verifications have been added to the work package for pump reassembly. These include a dimensional check of all bearing and shaft tolerances to ensure no binding. A shop test will be performed to demonstrate that cooling water flow exists through the entire shaft assembly before the pump is reinstalled in the ECW bay housing. Additional Foreign Material Exclusion inspections are being performed during pump repair and reassembly. These steps provide assurance that the required bearing cooling and lubrication water flow is available when the pump is started.

The repairs and reassembly of the Train C ECW pump will be followed by performance of required surveillance testing to verify operability. It is anticipated that corrective maintenance and testing can not be performed within the remaining Allowed Outage Time of Technical Specification 3.7.4 and the associated Specifications above, which expire on September 24 at 0200 hours.

The need for prompt action:

Prompt action is requested to approve the enforcement discretion to allow deviation from the shutdown requirements of the Action Statements of Technical Specifications 3.7.4, and the Technical Specifications for those systems supported by Essential Cooling Water, for a period of 5 days until September 29, 2001 at 0200 hours. This should allow adequate time to complete repairs, perform post maintenance testing and return the Train C ECW system to service without placing the plant through a transient to shutdown and cooldown. South Texas Project Unit 1 expects to remain at full coastdown power during the requested period of enforcement discretion.

Relevant ECW pump performance history:

Essential Cooling Water pumps at the South Texas Project have been refurbished by complete disassembly and reassembly 10 previous times. In most instances, these maintenance activities were trouble free with one exception. In this instance, minor maintenance was needed to properly assemble/align a pump column to prevent binding. Corrective actions were taken and this problem has not recurred.

A related maintenance activity resulted in the entry of foreign material into the pump suction. Cleanliness standards have been properly applied to materials entering the ECW bay to prevent recurrence.

With the exception of the current condition of the Unit 1 Train C ECW pump, the ECW Water pumps in both units are performing satisfactorily and meet their design requirements. Since two of the three pumps in each unit are normally in service, the normal run hours per pump per year is approximately 6000 hours. Despite this relatively high duty cycle (for an ESF pump), the pumps continue to be reliable and can be expected to continue to be reliable for the foreseeable future.

Additionally, open work orders and system health status were reviewed, and there are no outstanding issues that would impact the ability of the Unit 1 Train A and Train B ECW systems to continue to operate satisfactorily during the period of enforcement discretion.

3) **The safety basis for the request, including an evaluation of the safety significance and potential consequences of the proposed course of action. This evaluation should include at least a qualitative risk assessment.**

The Essential Cooling Water System (ECW) system is designed to supply cooling water to various safety-related systems for normal plant operation as well as normal shutdown and during and after postulated Design Basis Accidents (DBAs). The ECW system is designed to perform its cooling function following a DBA with either offsite or onsite power available, automatically and without operator action, assuming a single failure. A minimum of two ECW trains is required to operate following a DBA. A separate and independent ECW system is provided for each unit of the South Texas Project.

Heat rejection to the ECW system during either normal operation, normal shutdown, or DBA conditions is accomplished by three redundant cooling water loops, each having its own pump, motor, self-cleaning strainer, piping, valves, and instrumentation. Each loop contains one set of Standby Diesel Generator Heat Exchangers, one Component Cooling Water (CCW) Heat Exchanger, two essential chiller condensers, and one CCW pump supplementary cooler. Cooling water is supplied to each of these components during all modes of operation, whether or not the particular equipment is operating. An essential cooling water (ECW) loop is required to operate whenever its corresponding CCW loop is in operation.

In the event of Loss of Offsite Power (LOOP), power to the ECW pumps is supplied by the Emergency Safety Feature (ESF) buses, which is supplied by the Standby Diesel Generator. Each Class 1E ESF bus provides electrical power to its respective ECW system cooling loop. The only mechanical cross-tie between cooling loops allowed by plant procedures prior to this condition is between the supply piping of each loop, which is only used for filling of cooling loops following maintenance.

The currently degraded condition Train C ECW has two potential outcomes. Either the plant is maintained in an at-power condition for an additional period of 5 days to effect repairs on the pump, or the plant proceeds to cold shutdown in accordance with the Technical Specifications. In assessing the safety significance and potential consequences of the proposed enforcement discretion, it is necessary to characterize the effects on plant safety for these two conditions.

An assessment of the change in the South Texas Project Unit 1 core damage frequency due to allowing continued operation while repairing the Train C ECW beyond the Technical Specification AOT (Allowed Outage Time) of 7 days was performed for an additional period of 5 days. This assessment included systems supported by the ECW system in addition to the ECW system itself. This assessment was performed with the South Texas Project Probabilistic Risk Assessment (PRA) model. The PRA model is an at-power model including both internal and external events. The core damage frequency value determined by this model is then compared to the baseline risk (no equipment out of service) for the additional 5 days to determine the delta associated with the repair activity.

	CDF	LERF	ICCDP	ICLERP
With ECW Train C out-of-service	4.04E-05	2.85E-06	5.53E-07	3.91E-08
Baseline	6.51E-06	3.32E-07	8.92E-08	4.55E-09
Delta			4.64E-07	3.45E-08

The incremental conditional core damage probability (ICCDP) and the incremental conditional large early release probability (ICLERP) resulting from extending the Train C ECW repair time by 5 days were computed in accordance with the definitions in Regulatory Guide 1.177, “An Approach for Plant-Specific Risk-Informed Decisionmaking: Technical Specifications”. The values obtained for the ICCDP (4.64E-07) and the ICLERP (3.45E-08) demonstrate that the proposed repair completion time change has only a small quantitative impact (less than 5.0E-07 ICCDP and less than 5.0E-08 ICLERP per Regulatory Guide 1.177 on plant risk).

The results were then compared with the risk-significance guidance contained in Regulatory Guide 1.174 “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis”, for changes in the annual average delta-core damage frequency (CDF) and delta-large early release frequency (LERF). Since the additional AOT increase is expected to be a one-time occurrence, the ICCDP and ICLERP also represents the increase in risk on a yearly basis. Therefore, the change in annual risk is in Region III (very small risk) of the NRC’s CDF

and LERF acceptance guidelines in Figures 3 and 4 of Regulatory Guide 1.174 (less than 1.0E-06 delta CDF and 1.0E-7 delta LERF).

The planned compensatory measures described in Section 6 serve to further reduce the risk of continued power operation. While some of these measures are either explicitly modeled in the PRA or are considered in the PRA, additional measures not modeled or considered and described in Section 6 will be taken to compensate for this specific condition.

This very small change in risk must be balanced against the risk associated with the alternative of shutting down the plant to effect the repairs. While not quantifiable at the South Texas Project (the South Texas Project does not have a quantitative transition and shutdown model), there are risks associated with manually shutting the plant down from a stable condition. They include challenging systems that are currently in standby and requiring the operation of the decay heat removal systems with one train without its full complement of support systems. Therefore, we believe that the relative safety significance of the proposed enforcement discretion is low and the potential consequences of the proposed request are preferable to the potential consequences associated with plant shutdown.

Loss of electrical power is an important risk consideration at the South Texas Project and grid reliability is a factor in assessing its contribution to risk. The South Texas Project has contacted the Independent System Operator and confirmed the stability of the power grid and that there are no unusual factors that need to be considered in this evaluation.

The proposed action conforms to the requirements of the STP Configuration Risk Management Program (CRMP). South Texas will continue to use the CRMP to evaluate and monitor the risk significance associated with extending the Train C Essential Cooling Water outage. The CRMP requires the compensatory measures listed below to be implemented if the Non-Risk Significant Threshold of 1.0E-6 is exceeded.

- Notify the Duty Operations and Duty Plant Manager
- Identify and implement compensatory measures approved by the Duty Plant Manager. Compensatory measures may include but are not limited to the following:
 - Reduce the duration of the risk sensitive activities
 - Remove risk sensitivity activities from the planned work scope
 - Reschedule work activities to avoid high risk sensitive equipment outages or maintenance states
- Ensure any measures taken to reduce risk are recorded in the Control Room Logbook.

- Evaluate whether heightened station awareness is acceptable while attempting to return components or systems to functional status. Duty Plant Manager approval is required to solely implement heightened station awareness.

The above compensatory measures in addition to those listed in Section 6 have already been implemented, or are in the process of being implemented, to address the current condition with the Train C ECW pump.

The STP CRMP satisfies the Maintenance Rule requirements as specified in 10CFR50.65(a)(4).

Based on the above evaluation and the planned compensatory measures, the South Texas Project concludes that the proposed enforcement discretion does not involve an increase in radiological risk and that the granting of enforcement discretion will not be a potential detriment to the public health and safety.

- 4) **The basis for the licensee's conclusion that the noncompliance will not be of potential detriment to the public health and safety and that no significant hazard consideration is involved.**

Determination of No Significant Hazard Consideration

1. **Does the change involve a significant increase in the probability or consequence of an accident previously evaluated?**

Since only one train of components is affected by the condition and single failure is not considered while a plant is in an LCO ACTION, the operable ESF trains are adequate to maintain the plant's design basis. Thus, this condition will not alter assumptions relative to the mitigation of an accident or transient event.

Considering compensatory action and risks involved in a plant shutdown, STP has determined that there is no discernable risk associated with extending the allowed outage time for the Essential Cooling Water System and the systems it supports for an additional 5 days.

Based on this evaluation, there is no significant increase in the probability or consequence of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

This proposed action only extends an allowed outage time and will not physically alter the plant. No new or different type of equipment will be installed by this action. The changes in methods governing normal plant operation are consistent with current safety analysis assumptions. No change to the system as evaluated in the South Texas Project safety analysis is proposed.

Therefore, this proposed action does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

Considering compensatory action and risks involved in a plant shutdown, STP has determined that there is no discernable risk associated with extending the allowed outage time for the Essential Cooling Water System and the systems it supports for an additional 5 days.

Based on the availability of redundant systems, the compensatory actions that have been taken, and the extremely low probability of an accident that could not be mitigated by the available systems, it can be concluded that there is no significant reduction in the margin of safety.

Based on the above, it has been concluded that there is not a potential detriment to the public health and safety and that no significant hazard consideration exists as a result of this noncompliance.

5) The basis for the licensee's conclusion that the noncompliance will not involve adverse consequences to the environment.

The South Texas Project has reviewed the proposed Enforcement Discretion request and the Nuclear Regulatory Commission Final Environmental Assessment for the South Texas Project Units 1 and 2 and has concluded that pursuant to 10CFR51, there are no significant radiological or non-radiological impacts associated with the proposed Enforcement Discretion request.

This proposed Enforcement Discretion request has been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10CFR51.22(c)(9). The following is

a discussion of how the proposed Enforcement Discretion request meets the criteria for categorical exclusion.

- (i) The proposed change involves no Significant Hazards Consideration (refer to Section 4 above),
- (ii) there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite since the proposed changes do not affect the generation of any radioactive effluent nor do they affect any of the permitted release paths, and
- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Based on the aforementioned and pursuant to 10CFR51.22(b), no environmental assessment or environmental impact statement need be prepared.

6) Any proposed compensatory measures.

The following compensatory measures will be implemented during the period of enforcement discretion. These compensatory actions are broken down into three specific types (1) actions explicitly taken credit for in the PRA model, (2) actions not explicitly taken credit for in the PRA model, but are part of the administrative controls invoked when entering an extended allowed outage time and, (3) specific actions taken as a result of this condition. The first two types include the specific compensatory actions required by OPOP01-ZO-0006, “SDG, ECW, or Essential Chilled Water Extended Allowed Outage Time”. These compensatory measures were initiated once the Standby Diesel Generator (SDG), ECW, or Essential Chilled Water were out of service beyond 72 hours to offset the risk impacts of entering the Extended Allowed Outage Time.

Actions Explicitly Credited in the STP PRA Model

The following equipment is verified to be operable or functional during the extended allowed outage period:

- The TSC Diesel Generator (maintenance and/or testing is prohibited).
- The Positive Displacement Charging Pump (maintenance and/or testing is prohibited).

Actions Not Explicitly Credited in the STP PRA Model, But Part of Administrative Controls

The following equipment/lineups are verified to be operable or functional during the extended allowed outage period:

- The circuits required by Technical Specification LCO 3.8.1.1.a (circuits between the offsite transmission network and the onsite Class 1E Distribution System).
- The two remaining onsite power sources required by Technical Specification LCO 3.8.1.1.b (standby diesel generators and each separate fuel tank).
- The equipment specified by Technical Specification 3.8.1.1 Action d (All required systems, subsystems, trains, components, and devices that depend on the remaining OPERABLE diesel generator and the steam-driven auxiliary feedwater pump).
- The two supporting Essential Cooling Water loops required by Technical Specification LCO 3.7.4.
- The circuit between the 138KV offsite transmission network, via the Emergency Transformer, and the onsite Class 1E Distribution System.
- The 138KV line from Blessing to STP or the 138KV line from Lane City to Bay City (both must be in service).
- Maintenance activities in the switchyard which could directly cause a Loss Of Offsite Power event are prohibited.
- Maintenance activities that could result in an inoperable open containment penetration are prohibited.

Additional Specific Actions to Address the Current Condition

- In the event of a Loss of Offsite Power (LOOP), STP procedure 0POP04-AE-0001, "Loss of Any 13.8 kV or 4.16 kV Bus" provides specific steps required to cross-connect Train C Engineered Safety Features (ESF) bus power to an alternate emergency power source by back-feeding through an ESF transformer to the Emergency Bus. Loading on the ESF Bus is restricted to the 480 VAC ESF Load Centers, one centrifugal charging pump and its associated cubicle cooler, two Class 1E battery chargers and the 25 KVA TMI inverter.

- Instructions have been prepared that allow Operations Personnel to use a cross-connect that exists between the ECW trains. These instructions detail actions to take in the event of a LOOP that will allow for one ECW pump to supply cooling water to two Standby Diesel Generators (SDGs). Additional actions state the necessary steps to allow for one ECW pump to supply cooling water to two trains of Essential Chillers. These actions will only be implemented under emergency conditions.
- Surveillance and planned maintenance activities with the potential to cause a reactor/turbine trip or on-site power interruption in both units have been suspended to minimize any potential challenge to safety systems.

The Control Room personnel will be briefed on the above compensatory measures, and Control Room Log entries describing these compensatory measures will be made.

7) **The justification for the duration of the noncompliance.**

An additional 5 days are requested to allow sufficient time to complete the repair and testing of the Train C ECW pump. The duration of the request is non-risk significant.

The South Texas Project estimates that the repair work will require an additional 5 days beyond the current Allowed Outage Time of 7 days based upon working with the necessary resources continuously until the work is complete. All required repair parts are available. This estimate also considers the potential impact of inclement weather on the performance of the pump repair and reinstallation work.

8) **A statement that the request has been approved by the Plant Operations Review Committee**

The South Texas Project Plant Operations Review Committee has reviewed the proposed Enforcement Discretion request and concurs with the basis of this request.

9) **Discussion of How the Applicable Notice of Enforcement Discretion Criterion for the Appropriate Plant Condition Specified in Section B is Satisfied**

The applicable Notice of Enforcement Discretion criterion for the request of an additional 5 days to the Allowed Outage Time for the Essential Cooling Water System, and associated supported systems, is considered to be Criterion 1. Criterion 1 reads as follows:

1. “For an operating plant, the NOED is intended to (a) avoid undesirable transients as a result of forcing compliance with the license condition and, thus, minimize potential safety consequences and operational risks or (b) eliminate testing, inspection, or system realignment that is inappropriate for the particular plant condition.”

The South Texas Project request for Enforcement Discretion from the Action Statement of Technical Specification 3.7.4, and associated supported system Actions, is to facilitate affected Train C ECW pump repair and testing. The additional time is needed to avoid shutdown of the unit and avoid an undesirable transient as stated in the above criterion.

As stated earlier, the requested extension to the Limiting Condition for Operation action time provides the time required to perform the repairs and testing activities necessary to restore the Train C ECW pump to an operable status. As a result of these activities, plant configuration availability will be optimized, from a risk perspective, while avoiding administrative requirements of a power reduction transient that could increase the potential for plant trips that challenge safety systems.

10) **Follow-up License Amendment Required**

No follow-up License Amendment will be required.

11) **Additional information for enforcement discretion involving severe weather or other natural events**

This proposed enforcement discretion is not in response to severe weather or natural event.

Essential Cooling Water Pump Diagram

Figure 1
NOC-AE-01001188
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