

March 28, 1989

Docket No. 50-498

Mr. J. H. Goldberg
Group Vice-President, Nuclear
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77001

Dear Mr. Goldberg:

SUBJECT: ISSUANCE OF AMENDMENT NO. 7 TO FACILITY OPERATING LICENSE
NPF-76 - SOUTH TEXAS PROJECT, UNIT 1 (TAC NO. 67609)

The Commission has issued the enclosed Amendment No. 7 to Facility Operating License No. NPF-76 for the South Texas Project, Unit 1. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated March 8, 1988.

The amendment changes the Appendix A Technical Specifications by revising provisions of the TS relating to the toxic gas monitoring system. The changes will improve the operational reliability of the toxic gas monitoring system as well as reduce the number of unnecessary engineered safety feature (ESF) control room heating, ventilation, and air conditioning (HVAC) recirculation actuations.

A copy of the Safety Evaluation and Notice of Issuance supporting the amendment are also enclosed.

Sincerely,
/s/
George F. Dick, Jr., Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 7 to NPF-76
- 2. Safety Evaluation
- 3. Notice

cc w/enclosures:
See next page

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DOCUMENT NAME: STP1 TOXIC GAS AMENDMENT

PD4/LA <i>PM</i>	PD4/PE <i>CHA</i>	PD4/PM <i>GDick</i>
PNoonan	CAbbate	GDick:sr
02/23/89	02/23/89	02/23/89

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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The amendment changes the Appendix A Technical Specifications by revising provisions of the TS relating to the toxic gas monitoring system. The changes will improve the operational reliability of the toxic gas monitoring system as well as reduce the number of unnecessary engineered safety feature (ESF) control room heating, ventilation, and air conditioning (HVAC) recirculation actuations.

A copy of the Safety Evaluation and Notice of Issuance supporting the amendment are also enclosed.

Sincerely,

A handwritten signature in cursive script that reads "George F. Dick, Jr.".

George F. Dick, Jr., Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 7 to NPF-76
2. Safety Evaluation
3. Notice

cc w/enclosures:
See next page

Mr. J. H. Goldberg
Houston Lighting and Power Company

South Texas Project

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Mr. J. H. Goldberg
Houston Lighting & Power

- 2 -

South Texas Project

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

HOUSTON LIGHTING & POWER COMPANY
CITY PUBLIC SERVICE BOARD OF SAN ANTONIO
CENTRAL POWER AND LIGHT COMPANY
CITY OF AUSTIN, TEXAS
DOCKET NO. 50-498
SOUTH TEXAS PROJECT, UNIT 1
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 7
License No. NPF-76

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Houston Lighting & Power Company* (HL&P) acting on behalf of itself and for the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and City of Austin, Texas (COA) (the licensees) dated March 8, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

*Houston Lighting & Power Company is authorized to act for the City Public Service Board of San Antonio, Central Power and Light Company and City of Austin, Texas and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

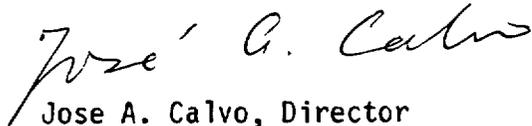
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-76 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 7 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 28, 1989

ATTACHMENT TO LICENSE AMENDMENT NO.

FACILITY OPERATING LICENSE NO. NPF-76

DOCKET NO. 50-498

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

Remove

3/4 3-75
3/4 7-18

Insert

3/4 3-75
3/4 7-18

INSTRUMENTATION

CHEMICAL DETECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.3.3.7 Two independent Chemical Detection Systems shall be OPERABLE with their Alarm/Trip Setpoints adjusted to actuate at the following concentrations:

- a. Vinyl Acetate ≤ 10 ppm
- b. Anhydrous Ammonia/
Ammonium Hydroxide ≤ 25 ppm

APPLICABILITY: All MODES.

ACTION:

- a. With one Chemical Detection System inoperable, restore the inoperable system to OPERABLE status within 7 days or within the next 6 hours initiate and maintain operation of the Control Room Emergency Ventilation System in the recirculation mode of operation.
- b. With both Chemical Detection Systems inoperable, within 1 hour initiate and maintain operation of the Control Room Emergency Ventilation System in the recirculation mode of operation.

SURVEILLANCE REQUIREMENTS

4.3.3.7 Each Chemical Detection System shall be demonstrated OPERABLE by performance of a CHANNEL CHECK at least once per 12 hours, an ANALOG CHANNEL OPERATIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 18 months.

INSTRUMENTATION

3.3.3.8 (This specification number is not used.)

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:
- 1) Verifying that the makeup and cleanup systems satisfy the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% for HEPA filter banks and 0.10% for charcoal adsorber banks and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 6000 cfm \pm 10% for the cleanup units and 1000 cfm \pm 10% for the makeup units;
 - 2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and a relative humidity of 70%; and
 - 3) Verifying a system flow rate of 6000 cfm \pm 10% for the cleanup units and 1000 cfm \pm 10% for the makeup units during system operation when tested in accordance with ANSI N510-1980.
- d. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and a relative humidity of 70%;
- e. At least once per 18 months by:
- 1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.1 inches Water Gauge for the makeup units and 6.0 inches Water Gauge for the cleanup units while operating the system at a flow rate of 6000 cfm \pm 10% for the cleanup units and 1000 cfm \pm 10% for the makeup units;
 - 2) Verifying that on a control room emergency ventilation test signal (High Radiation and/or Safety Injection test signal), the system automatically switches into a recirculation and makeup air filtration mode of operation with flow through the HEPA filters and charcoal adsorber banks of the cleanup and makeup units;

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 3) Verifying that the system maintains the control room envelope at a positive pressure of greater than or equal to 1/8 inch Water Gauge at less than or equal to a pressurization flow of 2000 cfm relative to adjacent areas during system operation;
 - 4) Verifying that the makeup filter unit heaters dissipate 4.5 ± 0.45 kW when tested in accordance with ANSI N510-1980; and
 - 5) Verifying that on a High Toxic Gas test signal, the system automatically switches into a recirculation mode of operation by isolating the normal supply and exhaust flow within 5 seconds.
- f. After each complete or partial replacement of a HEPA filter bank, by verifying that the HEPA filter bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the system at a flow rate of $6000 \text{ cfm} \pm 10\%$ for the cleanup units and $1000 \text{ cfm} \pm 10\%$ for the makeup units; and
- g. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorber bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.10% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of $6000 \text{ cfm} \pm 10\%$ for the cleanup units and $1000 \text{ cfm} \pm 10\%$ for the makeup units.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 7 TO

FACILITY OPERATING LICENSE NO. NPF-76

HOUSTON LIGHTING & POWER COMPANY

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

CENTRAL POWER AND LIGHT COMPANY

CITY OF AUSTIN, TEXAS

DOCKET NO. 50-498

SOUTH TEXAS PROJECT, UNIT 1

1.0 INTRODUCTION

By application dated March 8, 1988, Houston Lighting & Power Company, et. al., (the licensee) requested changes to the Technical Specifications (TS) (Appendix A to Facility Operating License No. NPF-76) for South Texas Project, Unit 1. The proposed changes would revise provisions of the TS relating to the toxic gas monitoring system. The proposed changes will improve the operational reliability of the toxic gas monitoring system as well as reduce the number of unnecessary engineered safety feature (ESF) control room heating, ventilation, and air conditioning (HVAC) recirculation actuations.

2.0 DISCUSSION

In the March 8, 1988 letter, the licensee proposed modifications to the toxic gas monitoring system which included:

- (1) revising the toxic gas monitor ESF actuation logic to provide an actuation signal on a two-out-of-two logic for monitor failure instead of a one-out-of-two logic as exists in the present design (the high toxic gas actuation of one-out-of-two is retained);
- (2) providing separate power supplies from non-Class 1E uninterruptable sources to each monitor;
- (3) providing a separate control room annunciator for "High Toxic Gas Concentration" and "Monitor Trouble";
- (4) relocating the sample intake duct nearer the building entrance to reduce the volume of toxic gas which would enter the control room before the isolation dampers close;

- (5) deleting hydrazine from the Final Safety Analysis Report (FSAR) and TS as a monitored/isolated actuation chemical because control room habitability calculations demonstrate that the control room operators will not be incapacitated by a postulated hydrazine spill;
- (6) increasing the setpoint for the ammonia channel in the FSAR and TS to 25 parts per million (ppm) because the revised calculations utilizing techniques in NUREG/CR-1741 demonstrate the operators would have adequate time to don breathing apparatus after a toxic gas release before becoming incapacitated;
- (7) revising the TS response time from 25 seconds to 5 seconds for isolation upon a high toxic gas signal (a total of 80 seconds is allowed to isolate the control room when setpoint concentrations are reached at the monitor sample point in the duct); and
- (8) revising the FSAR to add acetaldehyde as a monitored chemical.

3.0 EVALUATION

The staff has reviewed the modifications for acceptability. The evaluations are provided below.

(1) Revised ESF actuation logic

The proposed change would provide an actuation signal on a two-out-of-two logic for monitor failure while retaining a one-out-of-two logic for the high toxic gas signal. The current plant Technical Specification Section 3.3.3.7 requires that two independent chemical detection systems be operable. With one system inoperable, the inoperable system is required to be restored to operable status within seven days or within the next six hours the control room shall be in the emergency recirculation mode of operation.

Deletion of the two-out-of-two monitor failure logic will not affect the reliability of this system to respond to a toxic gas release. Based on maintaining a one-out-of-two logic for high toxic gas actuation and an action statement in the TS requiring restoration of an inoperable system, the staff finds the modification acceptable.

(2) Separate power supplies

The proposed change would provide power sources from separate non-Class 1E uninterruptible power supplies to each monitor. The proposed change will improve the operational reliability of the toxic gas monitoring system. The staff finds this modification acceptable.

(3) Separate control room annunciators

The proposed modification would provide separate control room annunciators for "High Toxic Gas Concentration" and "Monitor Trouble".

This change will assist the operator in identifying the actual condition. With the existing design, the alarm may represent either a monitor failure or a high toxic gas concentration, thus forcing the operator to make an assumption regarding the cause of the alarm. This change will remove much of the doubt that presently exists with regard to the cause of the annunciator.

(4) Relocating the sample intake duct

The proposed modification would relocate the sample point by running instrument tubing to the sample intake duct nearer the control room building entrance. The consequence of this proposed change would be to reduce the volume of any toxic gas that would enter the control room before the isolation dampers close.

The staff determined that this modification does not involve an increase in the probability of an accident, would not create the possibility of a new type of accident, and does not reduce the margin of safety provided by the license technical specification. Accordingly, the staff determined that the proposed relocation of sample point would not adversely affect the control room habitability and is, therefore, acceptable.

(5) Deleting hydrazine from the FSAR and TS

The licensee requested the change after reviewing the results of revised calculations of control room habitability following a toxic gas release. The new versions of the calculations use an "incapacitation model based on the techniques described in NUREG/CR-1741, "Model for The Estimation of Incapacitation Times Following Exposures of Toxic Gases or Vapors". The basis for the revised technique is that physical incapacitation of the operator is dependent on duration of exposure as well as the concentration of the toxic material. The earlier version neglected the operators' duration of exposure.

The staff independently analyzed the control room habitability with respect to maintaining the control room in a safe and habitable condition following a postulated spill of the entire amount (4000 lbs.) of hydrazine stored at the site using the methodology described in NUREG-0570, "Toxic Vapor Concentrations in the Control Room following a Postulated Accidental Release." The staff found, that even with the postulated spill, the concentrations would not incapacitate the control room operators and thus pose no significant hazard to them. Accordingly, deletion of hydrazine from the FSAR and Technical Specifications would not adversely affect the control room habitability.

(6) Increasing the setpoint of the ammonia channel

As in the instance of the previous change (5), the licensee requested this change after reviewing the results of calculations performed according to the guidance of NUREG/CR-1741.

The staff determined, by analysis using the methodology described in NUREG-0570, that raising the setpoint of the ammonia channel to 25 ppm would pose no significant hazard to the control room operators. While increasing the setpoint to 25 ppm from the current value of 5 ppm, the control room operators would still have ample time to take protective actions when necessary in accordance with the guidelines provided in Regulatory Guides 1.78 and 1.95. Accordingly, raising the setpoint for ammonia to 25 ppm would not adversely affect the control room habitability. The proposed change is acceptable.

(7) Revising the TS response time for isolation

The licensee proposed changing the response time for isolation upon a high toxic gas signal from 25 seconds to 5 seconds. This change was proposed in conjunction with the revisions to the setpoints (previously discussed) as determined using the guidance of NUREG/CR-1741. The staff in reviewing this request concluded that it would not increase the possibility of incapacitation of the operators for those cases where setpoints were increased and would increase the margin of safety where there was no change in the setpoints. Accordingly, this modification would not adversely affect the control room habitability.

(8) Revising the FSAR to add acetaldehyde as a monitored chemical (automatic isolation of the control room is not provided)

After reviewing Regulatory Guide 1.78 screening criteria and before performing the revised calculation, the licensee stated that acetaldehyde should be included in the toxic gas calculations. In reviewing this proposed change, the staff concluded that the inclusion of acetaldehyde as a monitored chemical improves the margin of control room habitability and is therefore acceptable.

The bases for acceptance of some of the proposed changes are that the staff's independent analyses using the methodology described in NUREG-0570 meet: (1) the requirements specified in Task Action Plan Item III.D.3.4 of NUREG-0737 and (2) the acceptance criteria provided in Standard Review Plan Section 6.4.

4.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32 and 51.35, an environmental assessment and finding of no significant impact was published in the Federal Register on March 10, 1989 (54 FR 10198).

Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

5.0 CONCLUSION

Based upon its evaluation of the proposed changes to the South Texas Project, Unit 1, Technical Specifications, the staff has concluded that: there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. The staff, therefore, concludes that the proposed changes are acceptable, and are hereby incorporated into the South Texas Project, Unit 1 Technical Specifications.

Date: March 28, 1989

Principal Contributors: H. Li
J. Lee
J. Wing

UNITED STATES NUCLEAR REGULATORY COMMISSIONHOUSTON LIGHTING & POWER COMPANYDOCKET NO. 50-498NOTICE OF ISSUANCE OF AMENDMENT TOFACILITY OPERATING LICENSE

The U.S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 7 to Operating License No. NPF-76 issued Houston Lighting & Power Company, which revised the Technical Specifications for operation of the South Texas Project, Unit 1 located in Matagorda County, Texas. The amendment is effective as of the date of issuance.

The amendment revised provisions of the Technical Specifications (TS) relating to the toxic gas monitoring system. The changes will improve the operational reliability of the toxic gas monitoring system as well as reduce the number of unnecessary engineered safety feature control room heating, ventilation, and air conditioning recirculation actuations.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment.

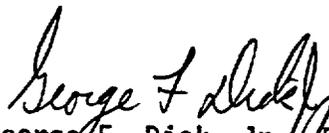
Notice of Consideration of Issuance of Amendment and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on September 12, 1988 (53 FR 35245). No request for a hearing or petition for leave to intervene was filed following this notice.

The Commission has prepared an Environmental Assessment related to the action and has determined not to prepare an environmental impact statement. Based upon the environmental assessment, the Commission has concluded that the issuance of this amendment will not have a significant effect on the quality of the human environment.

For further details with respect to the action see (1) the application for amendment dated March 8, 1988, (2) Amendment No. 7 to License No. NPF-76, and (3) the Commission's related Safety Evaluation and Environmental Assessment. All of these items are available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C., and at the Wharton County Junior College, J. M. Hodges Learning Center, 911 Boling Highway, Wharton, Texas 77488 and Austin Public Library, 810 Guadalupe Street, Austin, Texas 78701. A copy of items (2) and (3) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Reactor Projects - III, IV, V and Special Projects.

Dated at Rockville, Maryland this 28th day of March, 1989.

FOR THE NUCLEAR REGULATORY COMMISSION



George F. Dick, Jr., Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation