

November 8, 1991

Docket Nos. 50-498
and 50-499

Mr. Donald P. Hall
Group Vice-President, Nuclear
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77251

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Dear Mr. Hall:

SUBJECT: ISSUANCE OF AMENDMENT NOS. 31 AND 22 TO FACILITY OPERATING
LICENSE NOS. NPF-76 AND NPF-80 - SOUTH TEXAS PROJECT, UNITS 1
AND 2 (TAC NOS. 77380 AND 77381)

The Commission has issued the enclosed Amendment Nos. 31 and 22 to Facility Operating License Nos. NPF-76 and NPF-80 for the South Texas Project, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to a portion of your application dated December 21, 1990 (ST-HL-AE-3642), as supplemented by letter dated October 15, 1991 (ST-HL-AE-3893).

The amendments change the Appendix A Technical Specifications by revising TS 3.4.9.3 to remove a conflict between it and TS 4.0.5. The change will permit full operability testing of an inoperable pressurizer PORV following maintenance on the PORVs.

A copy of the Safety Evaluation supporting the amendments is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY

George F. Dick, Jr., Project Manager
Project Directorate IV-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 31 to NPF-76
2. Amendment No. 22 to NPF-80
3. Safety Evaluation

cc w/enclosures:
See next page

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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. 31
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 December 21, 1990, as supplemented by letter dated October 15, 1991, 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. 31 , 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



Suzanne C. Black, Director
Project Directorate IV-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 8, 1991



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. 50-499
SOUTH TEXAS PROJECT, UNIT 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 22
License No. NPF-80

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 December 21, 1990, and supplemented by letter dated October 15, 1991, 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-80 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 22 , 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



Suzanne C. Black, Director
Project Directorate IV-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 8, 1991

ATTACHMENT TO LICENSE AMENDMENT NOS. 31 AND 22
FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80
DOCKET NOS. 50-498 AND 50-499

Replace the following page of the Appendix A Technical Specifications with the attached page. The revised page is identified by Amendment number and contains vertical lines indicating the area of change. The corresponding overleaf page is also provided to maintain document completeness.

REMOVE

3/4 4-36

INSERT

3/4 4-36

REACTOR COOLANT SYSTEM

PRESSURIZER

LIMITING CONDITION FOR OPERATION

- 3.4.9.2 The pressurizer temperature shall be limited to:
- a. A maximum heatup of 100°F in any 1-hour period,
 - b. A maximum cooldown of 200°F in any 1-hour period, and
 - c. A maximum spray water temperature differential of 621°F.

APPLICABILITY: At all times.

ACTION:

With the pressurizer temperature limits in excess of any of the above limits, restore the temperature to within the limits within 30 minutes; perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the pressurizer; determine that the pressurizer remains acceptable for continued operation or be in at least HOT STANDBY within the next 6 hours and reduce the pressurizer pressure to less than 500 psig within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.9.2 The pressurizer temperatures shall be determined to be within the limits at least once per 30 minutes during system heatup or cooldown. The spray water temperature differential shall be determined to be within the limit at least once per 12 hours during auxiliary spray operation.

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.9.3 At least one of the following Overpressure Protection Systems shall be OPERABLE:

- a. Two power-operated relief valves (PORVs) with lift settings which do not exceed the limit established in Figure 3.4-4, or
- b. The Reactor Coolant System (RCS) depressurized with an RCS vent of greater than or equal to 2.0 square inches.

APPLICABILITY: MODES 4 and 5, and MODE 6 when the head is on the reactor vessel.

ACTION:

- a. With one PORV inoperable in MODE 4, restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 2.0 square inch vent within the next 8 hours.
- b. With one PORV inoperable in MODES 5 or 6 with the head on the reactor vessel, restore the inoperable PORV to OPERABLE status within 24 hours, or complete depressurization and venting of the RCS through at least a 2 square inch vent within the next 8 hours.*
- c. With both PORVs inoperable, depressurize and vent the RCS through at least a 2.0 square inch vent within 8 hours.*
- d. In the event either the PORVs or the RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence.
- e. The provisions of Specification 3.0.4 are not applicable.

*This ACTION may be suspended for up to 7 days to allow functional testing to verify PORV operability. During this test period, operation of systems or components which could result in an RCS mass or temperature increase will be administratively controlled. During the ASME stroke testing of two inoperable PORVs, cold overpressurization mitigation will be provided by two RHR discharge relief valves associated with two OPERABLE and operating RHR loops which have the auto closure interlock bypassed [or deleted]. If one PORV is inoperable, cold overpressure mitigation will be provided by the OPERABLE PORV and one RHR discharge relief valve associated with an OPERABLE and operating RHR loop which has the auto closure interlock bypassed [or deleted].

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.9.3 At least one of the following Overpressure Protection Systems shall be OPERABLE:

- a. Two power-operated relief valves (PORVs) with lift settings which do not exceed the limit established in Figure 3.4-4, or
- b. The Reactor Coolant System (RCS) depressurized with an RCS vent of greater than or equal to 2.0 square inches.

APPLICABILITY: MODES 4 and 5, and MODE 6 when the head is on the reactor vessel.

ACTION:

- a. With one PORV inoperable in MODE 4, restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 2.0 square inch vent within the next 8 hours.
- b. With one PORV inoperable in MODES 5 or 6 with the head on the reactor vessel, restore the inoperable PORV to OPERABLE status within 24 hours, or complete depressurization and venting of the RCS through at least a 2 square inch vent within the next 8 hours.*
- c. With both PORVs inoperable, depressurize and vent the RCS through at least a 2.0 square inch vent within 8 hours.*
- d. In the event either the PORVs or the RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence.
- e. The provisions of Specification 3.0.4 are not applicable.

*This ACTION may be suspended for up to 7 days to allow functional testing to verify PORV operability. During this test period, operation of systems or components which could result in an RCS mass or temperature increase will be administratively controlled. During the ASME stroke testing of two inoperable PORVs, cold overpressurization mitigation will be provided by two RHR discharge relief valves associated with two OPERABLE and operating RHR loops which have the auto closure interlock bypassed [or deleted]. If one PORV is inoperable, cold overpressure mitigation will be provided by the OPERABLE PORV and one RHR discharge relief valve associated with an OPERABLE and operating RHR loop which has the auto closure interlock bypassed [or deleted].



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 31 AND 22 TO

FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

HOUSTON LIGHTING & POWER COMPANY

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

CENTRAL POWER AND LIGHT COMPANY

CITY OF AUSTIN, TEXAS

DOCKET NOS. 50-498 AND 50-499

SOUTH TEXAS PROJECT, UNITS 1 AND 2

1.0 INTRODUCTION

By application dated December 21, 1990 (ST-HL-AE-3642), and as supplemented by letter dated October 15, 1991, Houston Lighting & Power Company, et. al., (the licensee) requested changes to the Technical Specifications (TS) (Appendix A to Facility Operating License Nos. NPF-76 and NPF-80) for the South Texas Project, Units 1 and 2. The majority of the proposed changes were in response to Generic Letter 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors.'" The licensee also addressed a conflict in the TS between TS 3.4.9.3 and TS 4.0.5 which would not permit full operability testing of inoperable pressurizer power-operated relief valves (PORVs) following maintenance on the PORVs. This safety evaluation addresses the pressurizer PORV testing issue. Clarifying information in support of the amendment request was provided by the licensee's letter dated October 15, 1991 (ST-HL-AE-3893). The October 15, 1991, submittal did not change the initial no significant hazards consideration determination.

2.0 BACKGROUND

Technical Specification 3/4.4.9, Pressure/Temperature Limits Reactor Coolant System, establishes the limiting reactor coolant system (RCS) pressure and temperature for all operating modes. The requirements for the overpressure protection systems are given in Limiting Condition for Operation (LCO) 3.4.9.3. This LCO states that two power-operated relief valves (PORVs) are to be operable during Modes 4 and 5, and Mode 6 with the head on the reactor vessel, or that the RCS be depressurized with an RCS vent of greater than or equal to 2.0 square inches. Action a. of this LCO states that with one PORV inoperable, the inoperable PORV is to be restored to OPERABLE status within 7 days or the

reactor pressure vessel (RPV) is to be depressurized and vented through a 2.0 square inch vent within the next 8 hours. Action b. of this LCO states that with both PORVs inoperable, depressurization and venting of the RCS through a 2.0 square inch vent is required within 8 hours.

Pressurizing the RCS to stroke test a Pressurizer PORV following the performance of required maintenance or repairs as required by Technical Specification 4.0.5 creates a conflict with Technical Specification 3.4.9.3 requirements since a nominal test pressure is required to overcome the internal spring pressure of the solenoid operated PORVs.

The required test provides verification of valve operability in accordance with the ASME code requirements. This proposed test complies with the requirements of Technical Specification 4.0.5 and the intent of Generic Letter 90-06. Prior to this test the ANALOG CHANNEL OPERATIONAL TEST specified in Surveillance Requirement 4.4.9.3.1.a would be performed to provide reasonable assurance that the administratively declared inoperable PORV will function if required. The ASME operability test cannot be performed without suspending the requirement to depressurize and vent the RPV if one or both PORVs are inoperable since a nominal reactor coolant system pressure is necessary to perform the test and the test cannot be conducted within the time allowed by the LCO.

3.0 EVALUATION

The proposed TS change to allow the utilization of the residual heat removal (RHR) relief valves for low temperature overpressure (LTOP) protection on a temporary basis during testing of the PORVs requires evaluation regarding the ability of the RHR relief valves to fulfill the LTOP function and the potential impact of relief valve actuation on the operation of the RHR system. In addition, evaluation of the specifics associated with the proposed TS change such as the seven day allowed outage time for the PORVs and the administrative limits associated with LTOP protection are also important in the evaluation. The proposed TS change would allow the RHR relief valves to serve as an alternate to the normal LTOP protection provided by the PORVs for a period of up to seven days. This allowance is required to compensate for an existing TS conflict which requires PORV operability or RCS depressurization during Mode 5 (cold shutdown) even though entry into Mode 5 is required to perform the ASME Section XI testing due to the need to reach an RCS pressure which overcomes the PORV spring force.

The proposed TS change would allow an RHR relief valve to serve as LTOP protection in place of an inoperable PORV prior to the completion of the PORV's Section XI testing. If both PORVs were declared inoperable, two RHR relief valves are proposed to be acceptable. Conditions placed upon the use of the RHR relief valves for the LTOP function include; the associated RHR loop(s) must be operable and operating, the RHR suction valve auto closure interlocks must be bypassed or removed, and the time period in which this condition is acceptable is limited to seven days.

3.1 Minimize Occurrence of an Overpressurization Event

In addition to TS 3.4.9.3 with its associated proposed revision, the following administrative controls and TS requirements minimize both the potential for and the consequences of an overpressurization event during plant heatup and PORV testing:

- a. When RCS pressure is being maintained by the low pressure letdown control valve, the normal letdown orifices are bypassed but not isolated.
- b. Only one centrifugal charging pump (CCP) will be allowed to be operable; this minimizes the potential for a mass input overpressure transient.
- c. Administrative controls will be in place to ensure that the high head safety injection (HHSI) pumps will not operate during water solid operations with the PORV(s) inoperable to minimize the potential for creating a cold overpressure transient.
- d. The RCS pressure will be controlled at the minimum value necessary to perform the required testing of the inoperable PORV(s) (325-400 psig).
- e. A reactor coolant pump shall not be started with one or more of the RCS cold leg temperatures less than or equal to 350°F unless the secondary side water temperature of each steam generator is less than 50°F above the RCS cold leg temperature (TS 3.4.1.4.1.a).
- f. The positive displacement pump will be demonstrated inoperable during the water solid operations to minimize the potential for a mass input overpressure event.
- g. The RHR auto closure interlock will be bypassed (Unit 1) or deleted (Unit 2) during water solid operations to prevent the loss of letdown capability which could produce a mass input overpressure event.

3.2 Mitigation of an Overpressurization Event

If an overpressurization event occurs, its mitigation is based upon the relief capacity of the PORV(s) and the RHR relief valves as proposed by the TS change. Although the PORV(s) are declared inoperable prior to the completion of the ASME Section XI testing, the valves will have undergone the required maintenance during the outage and the cold overpressure mitigation system (COMS)/LTOP logic will be armed during the period in which the RHR relief valves will be recognized as the alternate LTOP protection system. However, since the PORV(s) will not be declared operable until the ASME stroke testing has been satisfactorily completed, the licensee has evaluated the ability of the RHR relief valves to mitigate a potential cold overpressure event.

The RHR relief valve is located on the discharge of the RHR pump and will lift at the design setpoint of 600 psig plus 10 percent accumulation pressure. With the RHR system operating, the RHR relief valve has been shown to open when the

RCS pressure is approximately 589 psig. The COMS/LTOP setpoint associated with the PORVs varies as a function of temperature and would be approximately 550 psig during the conditions associated with the performance of the ASME Section XI testing (a 60 psi allowance for measurement uncertainties results in an analytical setpoint of 610 psig). The evaluation included conditions associated with reactor coolant pumps operating, as well as idling, and in both cases the RHR relief valves were determined to lift at RCS pressures comparable to the PORV related COMS/LTOP channels.

The protection provided by the RHR relief valves is dependent upon their relief capacity in addition to the relief pressure setpoint. The mass addition transient considered during COMS/LTOP assumes a loss of letdown and a failed open charging valve. This results in a mass addition transient of 410 gpm. The transient is based upon the lockout of all HHSI pumps, low head safety injection (LHSI) pumps (LHSI pumps developed head is 315 psig and are therefore not significant to COMS/LTOP event even if operable), one CCP, and a positive displacement pump (PDP) during Modes 5 and 6. The RHR relief valves are designed to relieve 810 gpm flow with all charging pumps operating at full capacity, based on complete loss of letdown, and the charging flow control valve in the failed wide open position. The relief capacity and lift pressure associated with the RHR relief valve(s), combined with other administrative and TS limits, are considered adequate to mitigate the design cold overpressure event.

A consideration is whether actuation of the RHR relief valve(s) might affect RHR operability and thereby prevent the fulfillment of the LTOP function. In this regard, the licensee evaluated the potential for RHR pump runout and subsequent pump damage if the RHR relief valves opened to provide LTOP protection. Based upon calculations and RHR pump runout tests performed on STP Unit 2 prior to operation, the licensee determined that pump runout conditions would not result if the relief valves lifted during system operation. The calculations considered the RHR system pressure losses associated with pump runout and system operation during the period the RHR relief valves would be serving as the LTOP protection concurrent with the failure of the RHR heat exchanger outlet valve. The calculations determined that RHR pumps would not achieve the pump runout design flow of 4000 gpm during a mass addition accident. Unit 2 hot functional testing included testing of the RHR pumps due to pump runout concerns associated with increasing the RHR pumps miniflow line capacity. Operation of the pumps at or near the design runout conditions of 4000 gpm showed no indications of pump cavitation, vibration, or motor current exceeding manufacturer recommendations. Pump flows associated with those plant conditions in which the RHR relief valves would be providing LTOP protection are significantly less than the flows associated with the pump runout tests performed during Unit 2 hot functional testing. The miniflow line is isolated after the successful starting of an RHR pump and thus this flow path does not contribute to the pump runout concerns associated with the RHR relief valves LTOP function. The calculations and tests support the conclusion that the RHR system would remain operating during an overpressurization event in which the RHR relief valves lifted to provide LTOP protection.

3.3 Seven Day Suspension of the Action Statement

The seven day suspension period has been determined based upon the schedule of events associated with performance of the PORV testing and an evaluation of the protection provided by proposed LTOP function of the RHR relief valves and the administrative controls to limit the consequences of an overpressurization event. The events include the preparation for and subsequent filling and venting of the RCS, establishment of a letdown flow path, addition of heat to the RCS, forming a bubble in the pressurizer, performing surveillance on the reactor vessel head vent system, and performance of the PORV stroke testing. Considering the time associated with these activities and the provision of adequate margin for contingencies, the staff believes that an allowed PORV outage time of seven days is acceptable.

The justification for the seven day allowed PORV outage time included a review of the administrative controls in place to prevent and/or limit the consequences of an overpressurization event as well as the capability of the RHR relief valves to perform the LTOP function. As discussed above, the RHR relief valves combined with the other administrative and TS requirements have been demonstrated to provide adequate LTOP protection during Mode 4 operation prior to the completion of the PORV ASME Section XI testing.

4.0 SUMMARY

The licensee has demonstrated that the RHR relief valves can adequately serve as a substitute for the PORVs for LTOP protection during Mode 5 operation prior to the completion of the PORV ASME Section XI testing. The RHR relief valves have sufficient flow capacity and relief setpoints to mitigate a cold overpressure event. In addition, it has been shown through calculations and testing that the RHR system remain operable during a cold overpressure event with the RHR relief valves open to provide LTOP protection. Based upon its review of the proposed TS revision and the justifications discussed above, the staff has concluded that the proposed change to TS 3.4.9.3 which adds the RHR relief valve(s) as an acceptable alternate to the PORV(s) for LTOP protection for a period not to exceed seven days is acceptable.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendment. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant

increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 49918). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: William Reckley
Chu-Yu Liang

Date: November 8, 1991