

Mr. William T. Cottle
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

July 2, 1999

SUBJECT: SOUTH TEXAS PROJECT, UNIT 2 - ISSUANCE OF AMENDMENT RE: FUEL
HANDLING BUILDING EXHAUST AIR SYSTEM (TAC NOS. MA5974 AND
MA5975)

Dear Mr. Cottle:

The Commission has issued the enclosed Amendment No. 100 to Facility Operating License
No. NPF-80 for the South Texas Project, Unit 2. The amendment consists of changes to the
Technical Specifications (TSs) in response to your application dated July 1, 1999.

The amendment provides for a one-time change to TS 3.3.2 and 3.7.8 for Unit 2 to allow all fuel
handling building exhaust air system components to be inoperable for a period not to exceed
8 hours to facilitate repair of the Train B exhaust booster fan. This one-time change may be
used twice and will be effective only from the date of amendment issuance until July 14, 1999.

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

Sincerely,
Original signed by: TWA

Thomas W. Alexion, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures: 1. Amendment No. 100 to NPF-80
2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 2, 1999

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President and Chief Executive Officer
STP Nuclear Operating Company
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A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, reading "Thomas W. Alexion", is positioned above the typed name.

Thomas W. Alexion, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures: 1. Amendment No. 100 to NPF-80
2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

STP NUCLEAR OPERATING COMPANY

DOCKET NO. 50-499

SOUTH TEXAS PROJECT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 100
License No. NPF-80

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by STP Nuclear Operating Company* acting on behalf of itself and for Houston Lighting & Power Company (HL&P), the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and City of Austin, Texas (COA) (the licensees), dated July 1, 1999, 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.

*STP Nuclear Operating Company is authorized to act for Houston Lighting & Power Company (HL&P), 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.

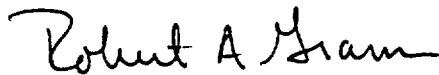
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-80 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 100 , 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. This amendment remains effective until July 14, 1999.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: July 2, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 100

FACILITY OPERATING LICENSE NO. NPF-80

DOCKET NO. 50-499

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

3/4 3-27*
3/4 3-28
3/4 7-19
3/4 7-20*
B 3/4 7-4

INSERT

3/4 3-27*
3/4 3-28
3/4 7-19
3/4 7-20*
B 3/4 7-4

*Overleaf pages provided to maintain document completeness. No changes on these pages.

Note: Amendment and revised TS pages to be filed under both docket numbers and Units 1 and 2 authority files to maintain document integrity.

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 19 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- ACTION 20 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:
- a. The inoperable channel is placed in the tripped condition within 1 hour, and
 - b. The Minimum Channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels per Specification 4.3.2.1.
- ACTION 21 - With less than the Minimum Number of Channels OPERABLE, within 1 hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition, or apply Specification 3.0.3.
- ACTION 22 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.
- ACTION 23 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours.
- ACTION 24 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or declare the associated valve inoperable and take the ACTION required by Specification 3.7.1.5.
- ACTION 25 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

ACTION 26- With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, declare the affected Auxiliary Feedwater Pump inoperable and take ACTION required by Specification 3.7.1.2.

ACTION 27- MODES 1, 2, 3, 4: With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6: With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, restore the inoperable Channel to OPERABLE status within 48 hours or initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System (at 100% capacity) in the recirculation and makeup filtration mode.

ACTION 28- MODES 1, 2, 3, 4: With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, within 1 hour isolate the Control Room Envelope and maintain operation of the ventilation system in the filtered recirculation mode.

MODES 5 and 6: With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System (at 100% capacity) in the recirculation and makeup filtration mode.

ACTION 29*- MODES 1, 2, 3, 4: With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or either initiate and maintain operation of the FHB exhaust air filtration system (at 100% capacity) or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ACTION 30- With irradiated fuel in the spent fuel pool: With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, fuel movement within the spent fuel pool or crane operation with loads over the spent fuel pool may proceed provided the FHB exhaust air filtration system is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.

* With 2 or more FHB Exhaust Air actuation channels inoperable, restore the FHB Exhaust Air actuation channels to a condition that satisfies the ACTION statement above within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN in the following 30 hours. This exception is effective until July 14, 1999 for Unit 2 only. The exception may be used twice during this time period.

PLANT SYSTEMS

3/4.7.8 FUEL HANDLING BUILDING (FHB) EXHAUST AIR SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.8 The FHB Exhaust Air System comprised of the following components shall be OPERABLE:

- a. Two independent exhaust air filter trains,
- b. Three independent exhaust booster fans,
- c. Three independent main exhaust fans, and
- d. Associated dampers.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION: *

With less than the above FHB Exhaust Air System components OPERABLE but with at least one FHB exhaust air filter train, two FHB exhaust booster fans, two FHB main exhaust fans and associated dampers OPERABLE, 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.

SURVEILLANCE REQUIREMENTS

4.7.8 The Fuel Handling Building Exhaust Air System shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating with two of the three exhaust booster fans and two of the three main exhaust fans operating to maintain adequate air flow rate;
- b. At least once per 18 months and (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 cleanup system satisfies 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 29,000 cfm \pm 10%;
 - 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,

* With ALL FHB Exhaust Air System components inoperable, restore the FHB Exhaust Air System to a condition that satisfies the ACTION statement above within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN in the following 30 hours. This exception is effective until July 14, 1999 for Unit 2 only. The exception may be used twice during this time period.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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 29,000 cfm \pm 10% during system operation with two of the three exhaust booster fans and two of the three main exhaust fans operating when tested in accordance with ANSI N510-1980. All combinations of two exhaust booster fans and two main exhaust fans shall be tested.
- c. 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%;
- d. 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 inches Water Gauge while operating the system at a flow rate of 29,000 cfm \pm 10%;
 - 2) Verifying that the system starts on High Radiation and Safety Injection test signals and directs flow through the HEPA filters and charcoal adsorbers;
 - 3) Verifying that the system maintains the FHB at a negative pressure of greater than or equal to 1/8 inch Water Gauge relative to the outside atmosphere; and
 - 4) Verifying that the heaters dissipate 38 ± 2.3 kW when tested in accordance with ANSI N510-1980.*
- e. 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 29,000 cfm \pm 10%; and
- f. 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 29,000 cfm \pm 10%.

*During the first six weeks after March 28, 1989, testing will be required for both 50 kW and 38 kW heaters.

PLANT SYSTEMS

BASES

The limitations on minimum water level and maximum temperature are based on providing a 30-day cooling water supply to safety-related equipment without exceeding its design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants," March 1974.

3/4.7.6 (Not used)

3/4.7.7 CONTROL ROOM MAKEUP AND CLEANUP FILTRATION SYSTEM

The OPERABILITY of the Control Room Makeup and Cleanup Filtration System ensures that: (1) the ambient air temperature does not exceed the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable for operations personnel during and following all credible accident conditions. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rems or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.7.8 FUEL HANDLING BUILDING EXHAUST AIR SYSTEM

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

For Unit 2 only, from the date of amendment issuance through July 14, 1999, the limited allowed outage time is allowed for all of components of the Fuel Handling Building Exhaust Air System to be out of service in recognition of the fact that there are common plenums and the repair to the exhaust booster fan requires opening or entry into these plenums. This is acceptable based on the low probability of a design basis event in the brief allowed outage time and because administrative controls are imposed on the activities that provide for compensatory action to restore integrity of the system.

3/4.7.9 (Not Used)

SOUTH TEXAS - UNITS 1 & 2

B 3/4 7-4

Unit 1 - Amendment No. ~~48~~, 109 (MAY 17 1999)
Unit 2 - Amendment No. ~~9 - 66~~, 100



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 100 TO

FACILITY OPERATING LICENSE NO. NPF-80

STP NUCLEAR OPERATING COMPANY, ET AL.

SOUTH TEXAS PROJECT, UNIT 2

DOCKET NO. 50-499

1.0 INTRODUCTION

By application dated July 1, 1999, STP Nuclear Operating Company (the licensee) requested changes to the South Texas Project, Units 1 and 2, Technical Specifications (TSs) on an emergency basis. The proposed changes would provide for a one-time change to TS 3.3.2 and 3.7.8 for Unit 2 to allow all fuel handling building (FHB) exhaust air system components to be inoperable for a period not to exceed 8 hours to facilitate repair of the Train B exhaust booster fan. The one-time change may be used twice and would be effective only from the date of the amendment until July 14, 1999.

2.0 BACKGROUND

TSs 3.7.8 and 3.3.2 (Table 3.3-3, Functional Unit 11) require three independent fuel exhaust booster fans and three independent FHB main exhaust fans and actuation instrumentation to be operable. In addition, TS 3.9.12 establishes requirements for FHB exhaust air system during movement of fuel. No change to TS 3.9.12 is necessary because the licensee will comply with the applicable action of this TS to not move fuel or operate the crane over the spent fuel pool.

Operability of the FHB exhaust air system ensures that radioactive material leaking from the emergency core cooling equipment within the FHB following a loss-of-coolant accident (LOCA) and radioactive material release from an accident involving an irradiated assembly in the FHB are filtered prior to reaching the environment.

This occurrence is the first required replacement of exhaust booster fan 21B. Replacement of failed exhaust booster fan 21B will require a temporary modification to isolate the ductwork to the fan from the rest of the system. The process of installing and subsequently removing the temporary modification will require breaching the common exhaust and supply plenums serving the three exhaust booster fans. During the time the plenums are breached, the requirements of TS 3.7.8 for the FHB exhaust air system are not met. In addition, while the temporary modification is being installed and removed, the other exhaust booster fans and the main exhaust fans will be in pull-to-lock for personnel safety. In this condition, the system cannot automatically actuate and the requirements of TS 3.3.2, Table 3.3-3, Functional Unit 11 are not

met for all trains. Both of these conditions would require that TS 3.0.3 be entered, and shutdown of Unit 2 would be required.

The proposed change would allow all FHB exhaust air system components in Unit 2 to be inoperable for a period not to exceed 8 hours for installation and not to exceed 8 hours for removal of the temporary modification to allow repair of the failed exhaust booster fan. Installation and removal of this temporary modification would be allowed only once by this change and would be limited to a defined time period. The proposed change is required to address the South Texas Project plant design, which incorporates unique, three-train design features. The separate trains of ventilation in the FHB exhaust air system typically use common plenums or ductwork that must be opened to permit maintenance and testing. The proposed changes to the actions for the TSs will permit this maintenance to be conducted without entering TS 3.0.3 (requiring a shutdown of the unit). A permanent modification has been installed in Unit 1 to allow exhaust booster fan repairs without a need to secure the remaining two FHB exhaust ventilation trains. This same permanent modification is scheduled for installation in Unit 2 during the fall 1999 refueling outage.

3.0 EVALUATION

The safety basis for the staff's evaluation is to avoid an undesirable plant transient as a result of forcing compliance with the TSs for which no compensatory benefit to public health and safety existed. Compensatory measures proposed by the licensee for the time during which all FHB exhaust air system components would be inoperable and considered in the staff's evaluation included (1) stopping the movement of any loads over the spent fuel pool or any loads (as defined in the licensee's heavy loads program) over the emergency core cooling system pumps or suction piping in the FHB; (2) stopping any movement of irradiated fuel assemblies; (3) stopping all activities that could potentially affect spent fuel pool level or cooling; and (4) developing a pre-job briefing and other administrative controls to restore the FHB exhaust system within 16 minutes of an increase in reactor containment building radioactivity that would be an indication of a reactor coolant system leak, an increase in FHB radiation levels, or reactor trip (the FHB exhaust air system filters emergency core cooling system radioactive leakage that occurs during the recirculation phase of accident mitigation; the recirculation phase would not occur prior to 16 minutes after a postulated accident).

These compensatory measures are determined to be sufficient to provide reasonable assurance that there would not be any increase in either onsite and offsite dose consequences following a postulated fuel handling or LOCA and, as such, the proposed TSs are acceptable. In addition, a shutdown of Unit 2 to repair FHB exhaust Fan 21B would constitute a potential operational risk.

4.0 EMERGENCY CIRCUMSTANCES

The Commission's regulations in 10 CFR 50.91 contain provisions for issuance of amendments with less than a 30-day comment period if emergency circumstances are determined to exist.

Emergency situations involved those cases in which failure to act in a timely way results in the derating or shutdown of a nuclear power plant or prevents either resumption of operation or increase in power output up to the plant's licensed power level. Under emergency circumstances, the Commission may issue a license amendment involving no significant

hazards consideration without prior notice and opportunity for a hearing or for public comment. In such a situation, the Commission publishes a notice of issuance under 10 CFR 2.106, providing for opportunity for a hearing and for public comment after issuance.

For emergency circumstances, the licensee is required to explain the reason for the condition and why it could not be avoided. This requirement is intended to prevent the abuse of the special provisions of 10 CFR 50.91(a)(5).

Unit 1 FHB exhaust booster fan 11B failed in April 1998 and Unit 1 FHB exhaust booster fan 11A failed in October 1998. In both occurrences, the licensee requested and received enforcement discretion for TS.3.0.3 to support the use of the temporary modification to effect repairs. This emergency TS proposal is essentially the same as those previous requests for enforcement discretion. The TS 3.7.8 limiting condition for operation action statement for the FHB exhaust air system was entered at 3:00 a.m. Central Daylight Time (CDT) on June 29, 1999, to perform scheduled maintenance. On June 30, 1999, a ground was discovered in the FHB exhaust booster fan 21B during a surveillance following system maintenance. The fan was declared inoperable and the action statement of TS 3.7.8 remained in effect, with 7 days to restore the fan or be in at least hot standby in the next 6 hours and cold shutdown in the following 30 hours. The 7-day allowed outage time expires at 3:00 a.m. CDT July 6, 1999. Therefore, failure to act on the emergency amendment request in a timely manner will result in shutdown of Unit 2.

Following the 1998 exhaust booster fan failures, the licensee has made good faith attempts to alleviate a need for further licensing actions in the event of another exhaust booster fan failure, as discussed below. A TS amendment request was developed and submitted to the staff in September 1998 to allow, in part, for a 12-hour allowed outage time with all FHB exhaust air system components inoperable. However, the staff has delayed review of that amendment until the generic resolution of this TS is established. Also, a plant modification was developed and implemented during the spring 1999 Unit 1 refueling outage to allow replacement of FHB exhaust booster fan motors without a need to secure the remaining two FHB exhaust ventilation trains. This same modification is planned for implementation during the fall 1999 Unit 2 refueling outage. In addition, the licensee has determined the root cause for fan failures (inadequate insulation design and manufacturing quality) and developed a plan to systematically replace fan motors with upgraded spares while rewinding and restocking the warehouse spares.

Based on the above considerations, the staff concludes that the licensee has not abused the emergency provisions by failing to make a timely application for the amendment and that there are emergency circumstances present that warrant issuance of the amendment pursuant to 10 CFR 50.91(a)(5).

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission's regulations in 10 CFR 50.92(c) state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

Operation of the facility in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The fuel handling accident will be precluded from occurring by ensuring that no loads will be carried over the spent fuel pool and no movement of irradiated fuel will take place during the time that repairs are being made. Regarding the large-break LOCA, the FHB exhaust air system is not identified as a precursor to a design-basis event, and therefore, does change the probability of that accident. Regarding the consequences of an accident, administrative controls will be in place to restore the FHB exhaust system within 16 minutes of an increase in reactor containment building radioactivity that would be an indication of a reactor coolant system leak, increase in FHB radiation levels, or a reactor trip. The 16 minutes prior to radioactive emergency core cooling leakage occurring is adequate time to secure the work, ensure that the plenum integrity is restored and the FHB main and exhaust booster fans are started or placed in automatic, and for the workers to exit the FHB. The low likelihood of a design-basis accident during the limited period of allowed inoperability of this system coupled with compensatory actions that will be simple, straightforward, and well briefed prior to starting this evolution will not result in a significant increase in the consequences of an accident.

Operation of the facility in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve any new equipment and does not significantly alter the way in which existing equipment is operated.

Operation of the facility in accordance with the proposed amendment will not involve a significant reduction in a margin of safety. The margin of safety can be defined by the ability of the FHB exhaust air system to limit the release of radioactive materials and limit exposures to operators following a postulated accident. The only part of the proposed change that can have an effect on a margin of safety is the proposed allowance for all trains of the FHB exhaust air system to be inoperable for a limited period of time. However, the compensatory measures will restore the system prior to the time it is required to remove contaminants during a postulated accident. Therefore, the proposed changes will not significantly affect the ability to place and maintain the reactor in a safe shutdown condition and will not significantly affect the limiting of the release of any radioactive material.

Based on the above considerations, the staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

6.0 STATE CONSULTATION

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

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the 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 amendments involve 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 made a final finding that the amendment involves no significant hazards consideration. 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.

8.0 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 Contributor: T. Alexion

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