

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

May 17 1999

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS  
 RE: RELOCATION OF SNUBBER REQUIREMENTS FROM THE TECHNICAL  
 SPECIFICATIONS TO THE TECHNICAL REQUIREMENTS MANUAL  
 (TAC NOS. MA4137 AND MA4138)

Dear Mr. Cottle:

The Commission has issued the enclosed Amendment No. 109 to Facility Operating License No. NPF-76 and Amendment No. 96 to Facility License No. NPF-80 for the South Texas Project, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated October 29, 1998, as supplemented by letter dated March 15, 1999.

The amendments relocate the requirements in TS 3/4.7.9 and TS 6.10.3.l for snubbers to the Technical Requirements Manual.

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

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. 109 to NPF-76  
 2. Amendment No. 96 to NPF-80  
 3. Safety Evaluation

cc w/encls: See next page

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South Texas, Units 1 & 2

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

STP NUCLEAR OPERATING COMPANY

DOCKET NO. 50-498

SOUTH TEXAS PROJECT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 109  
License No. NPF-76

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 October 29, 1998, as supplemented by letter dated March 15, 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.

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\*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.

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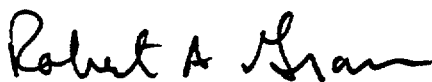
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-76 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 109, 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 and shall be implemented within 30 days of issuance.

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: May 17, 1999



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. 96  
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 October 29, 1998, as supplemented by letter dated March 15, 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.

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\*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.

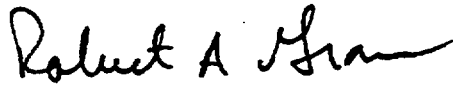
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-80 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 96 , 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 and shall be implemented within 30 days of issuance.

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: May 17, 1999

ATTACHMENT TO LICENSE AMENDMENT NOS. 109 AND 96

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

DOCKET NOS. 50-498 AND 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.

<u>Remove</u>	<u>Insert</u>
ix	ix
x	x*
xiii	xiii*
xiv	xiv
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3/4 7-22	3/4 7-22
3/4 7-22a	3/4 7-22a
3/4 7-22b	3/4 7-22b
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\*Overleaf pages provided to maintain document completeness. No changes on these pages.

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## PLANT SYSTEMS

### BASES

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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.

#### 3/4.7.9 (Not Used)

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## PLANT SYSTEMS

### BASES

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#### 3/4.7.10 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(a) (3) limits for plutonium. This limitation will ensure that leakage from Byproduct, Source, and Special Nuclear Material sources will not exceed allowable intake values.

Sealed sources are classified into three groups according to their use, with Surveillance Requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.11 (Not used)

3/4.7.12 (Not used)

CORE OPERATING LIMITS REPORT (Continued)

6.9.1.6.d The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
- c. All REPORTABLE EVENTS;
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;
- e. Records of changes made to the procedures required by Specification 6.8.1;
- f. Records of sealed source and fission detector leak tests and results; and
- g. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of doses received by all individuals for whom monitoring was required;
- d. Records of gaseous and liquid radioactive material released to the environs;

6.10 RECORD RETENTION (Continued)

- e. Records of transient or operational cycles for those unit components identified in the UFSAR;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of quality assurance activities required by the Operational Quality Assurance Plan;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings of the PORC and the NSRB;
- l. NOT USED
- m. Records of secondary water sampling and water quality;
- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL AND THE PROCESS CONTROL PROGRAM;  
and
- p. Records of radioactive shipments.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 20.1601(c) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of





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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 109 AND 96 TO

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

STP NUCLEAR OPERATING COMPANY

DOCKET NOS. 50-498 AND 50-499

SOUTH TEXAS PROJECT, UNITS 1 AND 2

1.0 INTRODUCTION

By application dated October 29, 1998, as supplemented by letter dated March 15, 1999, STP Nuclear Operating Company, et al., (the licensee) requested changes to the Technical Specifications (TSs) for the South Texas Project, Units 1 and 2. The proposed changes would relocate TS 3/4.7.9 and TS 6.10.3.I that address snubber requirements and the associated Bases to the Technical Requirements Manual (TRM).

2.0 BACKGROUND

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires that applicants for nuclear power plant operating licenses state TSs and that these TSs be included as a part of the license. The Commission's regulatory requirements related to the content of TSs are set forth in Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls and states also that the Commission may include additional TSs as it finds to be appropriate. However, the regulation does not specify the particular TSs to be included in a plant's license.

The regulation sets forth four criteria to be used in determining whether a limiting condition for operation (LCO) is required to be included in the TS, as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or

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actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; or (4) a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Existing LCOs and related surveillances included as TS requirements which fall within or satisfy any of the criteria must be retained in the TSs, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

While the four criteria specifically apply to LCOs, in adopting the revision to the rule, the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TSs (60 FR 36957). Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility. The administrative controls section of the TSs should include the information that the Commission deems essential for safe operation of the facility that is not already covered by the regulations. Accordingly, the staff has determined that requirements that are not specifically required under 10 CFR 50.36(c)(5), and which are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from administrative controls, relocated to more appropriate documents, and controlled by the applicable regulation.

### 3.0 EVALUATION

The existing TS 3/4.7.9 conditions, actions, and surveillance requirements for snubbers have been relocated to the TRM. These requirements define inspection schedules, types, sampling methods, and acceptance criteria. Hydraulic and mechanical snubbers are included in the plant design to ensure that the structural integrity of the reactor coolant system and other safety-related systems is maintained during and following a seismic or other dynamic event. They serve as an aid to preventing pipe failure, but do not mitigate pipe failure. Also, the failure of a snubber on a particular pipe cannot, by itself, cause the pipe to fail. Consequently, the snubber requirements do not meet 10 CFR 50.36 criteria since they are not used as part of the primary success path in detecting or mitigating the consequences of a design-basis accident or transient event.

In addition, TS 6.10.3.I, which states that retention of "records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.9 including the date at which the service life commences and associated installation and maintenance records," is relocated to the TRM. Record retention requirements are also located in 10 CFR Part 50, Appendix B, and in 10 CFR 50.71. It is not necessary to include redundant or additional requirements in the TS administrative controls.

Since the licensee has incorporated the TRM, by reference, into the Updated Final Safety Analysis Report, changes to the TRM would be controlled in accordance with approved station procedures and the requirements of 10 CFR 50.59. The staff, therefore, finds that sufficient regulatory controls exist. Accordingly, the staff has concluded that these requirements may be relocated from the TSs to the licensee's TRM.

In the October 29, 1998, application, the licensee provided the revised TRM pages that incorporate the limiting conditions for operation and surveillance requirements from TS 3/4.7.9 and the associated Bases. In the March 15, 1999, submittal, the licensee provided the revised TRM page that incorporates the record retention requirements. The staff has reviewed the

TRM changes and has verified that the information from TS 3/4.7.9 and TS 6.10.3.I has been appropriately relocated.

#### 4.0 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.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. 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 previously issued proposed findings that the amendments involve no significant hazards consideration, and there has been no public comment on such findings (63 FR 69346 and 64 FR 17031). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). These amendments also change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 6.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Marsha Gamberoni

Date: May 17, 1999