



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

June 25, 2002  
NOC-AE-02001353  
File No.: G25  
10CFR50.90  
STI:31462483

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Additional Information to Support the Request for Approval of  
Proposed Change to Technical Specification 3.9.4, Containment Building Penetrations

- References:
- 1) Letter from J. J. Sheppard to NRC Document Control Desk, "Proposed Change to Technical Specification 3.9.4, Containment Building Penetrations," October 22, 2001 (NOC-AE-01001144)
  - 2) Letter from J. J. Sheppard to NRC Document Control Desk, "Additional Information to Support the Request for Approval of Proposed Change to Technical Specification 3.9.4, Containment Building Penetrations," May 16, 2002 (NOC-AE-02001326)

Reference 1) requested allowance for the equipment hatch to be open during core alterations and/or during movement of irradiated fuel assemblies within containment and submitted a license amendment supporting associated revisions to Technical Specifications. Reference 2) provided additional requested information to support approval of Reference 1). A phone conversation with the NRC staff on June 19, 2002, revealed some confusion regarding specific wording in the Technical Specification Bases provided for the requested change and in the first question addressed in Reference 2). A modified Technical Specification Bases section is provided in the attachment to this letter for information.

In the first question addressed in Reference 2) and the proposed Bases to the Technical Specifications submitted with Reference 1), we stated that:

"Equipment hatch closure should occur as soon as practicable, and is normally assumed to occur, absent complications, in 2 hours."

We recognize that our wording "absent complications" has caused some confusion to the reviewers and may be confusing to others as well. Our intent with the statement was to convey

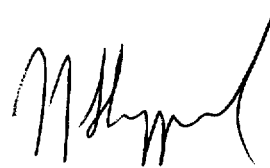
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that we cannot predict random events or extremely unlikely failures. We will change our description in the Bases to read (marked with change bar in the attachment for ease of recognition):

"Equipment hatch closure should occur as soon as practicable, and is normally assumed to occur in 2 hours."

STP Nuclear Operating Company confirms that no instances of expected failures were discovered that would prevent closing the equipment hatch when required. If you have any questions concerning this matter, please contact Mr. W. E. Mookhoek at (361) 972-7274 or me at (361) 972-7902.

I declare under penalty of perjury that the foregoing is true and correct.



J. J. Sheppard

Vice President and Assistant to  
the President and CEO

Executed on: 6/25/2002

WEM/

Attachment: 3/4.9.4 Bases (For Information)

cc:

(paper copy)

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## REFUELING OPERATIONS

### BASES

#### 3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The containment personnel airlock and auxiliary airlock, which are part of the containment pressure boundary, provide a means for personnel access during MODES 1, 2, 3, and 4 operation. The equipment hatch is required to be closed and sealed during MODES 1, 2, 3, and 4. During periods of shutdown, when containment closure is not required, the equipment hatch may be opened to allow passage of material needed to support activities in the containment building. The personnel and auxiliary airlock door interlock mechanisms may be disabled during shutdown, allowing both airlock doors to remain open for extended periods when frequent containment entry is necessary. Both containment personnel airlock doors may be open during CORE ALTERATIONS when specific limitations are satisfied. The specification requires: (1) there is 23 feet of water above the reactor vessel flange, (2) the reactor has been subcritical for  $\geq 95$  hours, (3) one airlock door is OPERABLE and, (4) an individual is available to close one personnel airlock door (if open) following a fuel handling accident inside containment.

The requirement to have 23 feet of water above the reactor vessel flange is consistent with the fuel handling accident analysis assumptions, Regulatory Guide 1.25, and Technical Specification 3.9.10, Water Level - Refueling Cavity.

Operability of a containment personnel airlock door requires that the door is capable of being closed, i.e., that the door is unblocked, no cables or hoses run through the personnel airlock, and at least one door seal is capable of being inflated. Containment personnel airlock door closure is required to take place within 30 minutes of initiation of a fuel handling accident inside containment if the reactor has been subcritical for less than 165 hours. Fuel movement is not permitted with personnel airlock doors open, if the reactor has not been subcritical for  $\geq 95$  hours. If the reactor has been subcritical for 165 hours or more, containment personnel airlock door closure is to occur as soon as practicable, but is assumed to occur within 2 hours to be consistent with the accident analysis.

The equipment hatch may also be open during CORE ALTERATIONS when specific limitations are satisfied. The specification requires: (1) there is 23 feet of water above the reactor vessel flange, (2) the reactor has been subcritical for  $\geq 165$  hours and, (3) the equipment hatch (if open) is capable of being closed following a fuel handling accident inside containment. The following administrative requirements will apply whenever the equipment hatch is open during core alterations or the movement of irradiated fuel in containment:

1. Appropriate personnel are aware of the open status of the containment during movement of irradiated fuel or CORE ALTERATIONS
2. Specified individuals are designated and readily available to close the equipment hatch following an evacuation that would occur in the event of a fuel handling accident
3. Obstructions (e.g., cables, hoses, and runway) that would prevent closure of the equipment hatch can be quickly removed.

The containment equipment hatch closure is required to take place upon the occurrence of a fuel handling accident inside containment if the hatch is open. Fuel movement is not permitted with

equipment hatch open, if the reactor has not been subcritical for  $\geq 165$  hours. Equipment hatch closure should occur as soon as practicable, and is normally assumed to occur in 2 hours. Unlike the airlock, the equipment hatch may be blocked by an obstruction (e.g. the removable equipment hatch runway). Fuel movement is not allowed with the runway installed unless the capability to remove all obstructions and close the hatch within the required time is maintained.

A surveillance requirement verifies that the proper tools are staged at the equipment hatch location and qualified personnel assigned to close the equipment hatch on a seven day frequency. These requirements assure that the associated doses are limited to within acceptable levels.