



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

January 15, 2003  
NOC-AE-03001455  
10CFR50.90  
STI: 31542887

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Additional Information Regarding Proposed Changes to  
Administrative Technical Specifications

Reference: Letter from J. J. Sheppard to NRC Document Control Desk, "Proposed Amendment to South Texas Project Technical Specifications to Revise Administrative Control Requirements," dated November 5, 2001 (NOC-AE-01001146)

In the referenced letter, STP Nuclear Operating Company (STPNOC) submitted a proposed amendment to South Texas Project Operating Licenses NPF-76 and NPF-80. This license amendment request proposed revising various administrative Technical Specifications to be consistent with current industry standards and guidance.

In an e-mail received on January 6, 2003, the NRC stated:

"Please note and provide documentation that item 6.8.3k will be deleted from Section 6.0 'Administrative Control.'

Item 6.8.3k called the Configuration Risk Management Program (CRMP) should be deleted:

- (1) Licensees are not required to place the CRMP in the TS Administrative Controls Section since the revision of the maintenance rule. The rule (a)(4) requires a program that could be a CRMP.
- (2) However, the STP CRMP does not even come close to the CRMP as described in RG 1.177. The program to implement (a)(4) needs to cover what RG 1.177 specifies to qualify for RI-TS.

Please comment and document response."

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The STP response to these comments is as follows:

Because the additional change proposed by the NRC was not evaluated or justified in the referenced submittal, STP would have to provide an additional Consideration of No Significant Hazards evaluation to address the elimination of Section 6.8.3k. This, in turn would require an additional notification in the Federal Register, would impact the development of the associated Safety Evaluation, and unnecessarily delay review and approval of the amendment.


Furthermore, Section 6.8.3k was added to the STP Technical Specifications as part of a specific amendment (Amendments 85 / 72, dated October 31, 1996) and represents the current STP licensing basis. Additionally, Specification 6.8.3k does not conflict with any existing Specification or any revised Specification proposed in the referenced letter.

Therefore, it is our intent to not request the elimination of Specification 6.8.3k as part of the proposed amendment. Rather, STP will propose this change as part of a separate license amendment request, and currently is considering including the elimination of 6.8.3k as part of our Risk Informed Technical Specification license amendment request, scheduled for submittal in the near future as part of an industry pilot program for risk informed Technical Specifications.

If there are any questions regarding the proposed amendment, please contact Mr. J. R. Morris (361) 972-8652 or me at (361) 972-7902.

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

Executed on January 15, 2003.  
Date



T. J. Jordan  
Vice President  
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jrm

cc:

(paper copy)

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