



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
Engineering & Technical Services

jrm

cc:

(paper copy)

Ellis W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

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

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Cornelius F. O'Keefe
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

L. D. Blaylock/W. C. Gunst
City Public Service

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

R. L. Balcom
Texas Genco, LP

A. Ramirez
City of Austin

C. A. Johnson
AEP Texas Central Company

Jon C. Wood
Matthews & Branscomb