

April 24, 2003

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

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS  
TO REVISE SPECIFIC REQUIREMENTS OF TECHNICAL  
SPECIFICATION 6.0, "ADMINISTRATIVE CONTROLS" (TAC NOS. MB3589  
AND MB3593)

Dear Mr. Cottle:

The Commission has issued the enclosed Amendment No. 151 to Facility Operating License No. NPF-76 and Amendment No. 139 to Facility Operating License No. NPF-80 for the South Texas Project (STP), Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 5, 2001, as supplemented by letters dated October 23, 2002, and January 15, 2003.

The amendments revise specific requirements of STP, Units 1 and 2 TS Section 6.0, "Administrative Controls" to be consistent with the Improved Standard Technical Specifications in NUREG-1431, "Standard Technical Specifications for Westinghouse Plants."

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

Sincerely,

*/RA/*

John L. Minns, Project Manager, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures: 1. Amendment No. 151 to NPF-76  
2. Amendment No. 139 to NPF-80  
3. Safety Evaluation

cc w/encls: See next page

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\*No change in the SE input

\*\*See previous concurrence

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STP NUCLEAR OPERATING COMPANY

DOCKET NO. 50-498

SOUTH TEXAS PROJECT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 151  
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 Texas Genco, LP, the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and the City of Austin, Texas (COA) (the licensees), dated November 5, 2001, as supplemented by letters dated October 23, 2002, and January 15, 2003, 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 Texas Genco, LP, the City Public Service Board of San Antonio, Central Power and Light Company, and the 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-76 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 151, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The STP Nuclear Operating Company 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 6 months from the date of issuance. Implementation of this amendment shall include the relocation of certain Technical Specifications to the appropriate licensee-controlled documents as described in the licensee's applications dated November 5, 2001, as supplemented by letters dated October 23, 2002, and January 15, 2003, and evaluated in the staff's Safety Evaluation enclosed with this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

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

Attachment: Changes to the Technical  
Specifications

Date of Issuance: April 24, 2003

STP NUCLEAR OPERATING COMPANY

DOCKET NO. 50-499

SOUTH TEXAS PROJECT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 139  
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 Texas Genco, LP, the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and the City of Austin, Texas (COA) (the licensees), dated November 5, 2001, as supplemented by letters dated October 23, 2002, and January 15, 2003, 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 Texas Genco, LP, the City Public Service Board of San Antonio, Central Power and Light Company, and the 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. 139, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The STP Nuclear Operating Company 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 6 months from the date of issuance. Implementation of this amendment shall include the relocation of certain Technical Specifications to the appropriate licensee-controlled documents as described in the licensee's applications dated November 5, 2001, as supplemented by letters dated October 23, 2002, and January 15, 2003, and evaluated in the staff's Safety Evaluation enclosed with this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

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

Attachment: Changes to the Technical  
Specifications

Date of Issuance: April 24, 2003

ATTACHMENT TO LICENSE AMENDMENT NOS. 151 AND 139

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>
xviii	xviii
xix	xix
xx	-----
1-4	1-4
1-5	1-5
2-1	2-1
3/4 1-6	3/4 1-6
3/4 3-61	3/4 3-61
3/4 3-71	3/4 3-71
3/4 4-16b	3/4 4-16b
3/4 4-36	3/4 4-36
3/4 5-3	3/4 5-3
3/4 5-6	3/4 5-6
3/4 8-2a	3/4 8-2a
Current TS 6.0 (in its entirety)	Improved TS 6.0 (in its entirety)

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 151 AND 139 TO

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

STP NUCLEAR OPERATING COMPANY, ET AL.

SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

1.0 INTRODUCTION

By application dated November 5, 2001, as supplemented by letters dated October 23, 2002, and January 15, 2003, STP Nuclear Operating Company (the licensee) requested changes to the Technical Specifications (TSs) for South Texas Project (STP), Units 1 and 2. The supplements dated October 23, 2002, and January 15, 2003, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on February 5, 2002 (67 FR 5335). The proposed amendments would convert the requirements of STP TS 6.0, "Administrative Controls," to be consistent with the Improved Standard Technical Specification (STS) based upon the following documents:

- NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," Revision 1, dated April 1995;
- The current STP TS (CTS)
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" July 22, 1993 (58 FR 39132)
- Section 10 CFR 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Technical Specifications," as amended July 19, 1995 (60 FR 36953).

Hereinafter, the proposed improved STS for STP are referred to as the ITS, while the current TS are referred to as the CTS.

During the NRC staff review of the license amendment request, wording differences were noted between the proposed changes to STP CTS 6.12 and the standard language prescribed by the STS in NUREG-1431. As a result, STP submitted revised proposed changes to CTS 6.12 in the supplement dated October 23, 2002, which supersede and replace the proposed changes submitted in the referenced amendment request, dated November 5, 2001. In a supplemental letter dated January 15, 2003, the licensee proposes to eliminate Section 6.8.3k as part of a separate license amendment in the near future.

## 2.0 REGULATORY EVALUATION

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TSs. In doing so, the Commission emphasized those matters related to the preventing of accidents and mitigating their consequences. As recorded in the Statements of Consideration, Technical Specifications for Facility Licenses: Safety Analysis Reports (33 FR 18610, December 17, 1968), the Commission noted that applicants are expected to incorporate into their TSs those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity. Pursuant to 10 CFR 50.36, TSs are required to include items in five specific categories related to station operation. Specifically, those categories include: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCO); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TS.

The NRC staff subsequently developed the STS based upon the criteria in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 FR 39132), which was subsequently codified by changes to 10 CFR 50.36 (60 FR 36953, July 19, 1995). The Final Policy Statement describes the safety benefits of the STSs and encouraged licensees to use the STSs as the basis for both plant-specific TS amendments and complete conversions to ITS based on the STSs. In addition, the Final Policy Statement provides guidance for evaluating the required scope of the TSs and defines the criteria to be used in determining which LCOs and associated SRs should remain in the TSs. With the current amendment request, STP proposes to upgrade its TSs for partial conversion to the STS.

Specifically, the license amendments request proposes to revise STP TS 6.0, "Administrative Controls," for both Units 1 and 2. The evaluation performed in support of the amendments request does not require any changes to the Updated Final Safety Analysis Report (UFSAR), with the exception of relocating specific requirements from TS 6.8.3.f to UFSAR Section 3.9.1. The amendments would also revise specific administrative control requirements denoted in STP TS 6.0 and associated administrative control requirements in other sections of the plant's TSs. In addition, the proposed amendments would relocate specific TS administrative control requirements from the plant's TSs to licensee-controlled documents; update specific management titles to more generic title positions, updating requirements to be consistent with current industry standards; and reformat, renumber, and reword existing requirements to enhance readability.

## 3.0 TECHNICAL EVALUATION

In reviewing the STP amendments request, the NRC staff evaluated the following five kinds of changes to the CTS, as defined by the licensee:

- A Administrative changes to the CTS that do not result in new requirements and do not change either operational restrictions or flexibility.
- M More restrictive changes to the CTS, add restrictions or reduce flexibility.
- L Less restrictive changes to the CTS , reduce restrictions or add flexibility.

- R Relocated Specifications, relocate the CTS requirements that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii).

These change-type indicators (A, M, L, and R) appear in parenthesis throughout this safety evaluation. In addition, the NRC staff review included evaluating whether existing regulatory requirements are adequate to control future changes to requirements that are removed from the CTS and placed in licensee-controlled documents.

### Administrative Controls

Table of Contents (A) The licensee proposes to revise the Table of Contents (pages xviii, xix, and xx) of the CTS to reflect the proposed changes to relocate applicable CTS requirements to licensee-controlled documents. The proposed changes are conforming changes that result from other changes to the CTS. Since the changes to the Table of Contents are administrative, with no impact of their own, the proposed changes are acceptable. The proposed changes follow the guidelines of NUREG-1431.

### Definitions

1.19 (A) The licensee proposes to delete Definition 1.19, "Offsite Dose Calculation Manual," and incorporate the text into TS 6.8.3.n. The licensee made additional editorial changes to improve the readability of Definition 1.19. Since the relocation of this definition from the TS is administrative, with no impact of its own, the proposed editorial changes are acceptable. The proposed changes follow the guidelines of NUREG-1431.

1.24 (R) The licensee proposes to relocate Definition 1.24, "Process Control Program (PCP)," to the Technical Requirements Manual (TRM). This is consistent with the requirements in TS 6.0 being relocated to the TRM. The PCP implements the requirements of 10 CFR Part 20, 10 CFR Part 61, and 10 CFR Part 71. Compliance with these regulations is required by the Operating Licenses, and procedures would be the method to ensure compliance with the program. The relocated details are not required to be in the TS to provide adequate protection of the public health and safety. The proposed change is acceptable and follows the guidelines of NUREG-1431.

### Safety Limits

2.1.1 and 2.1.2 (A) The reference to TS 6.7.1 is being deleted. TS 6.7.1 regarding the actions to be taken in the event of a safety limit is violated is redundant to the requirements of 10 CFR 50.36(c)(1), and has been deleted. Although not required as necessary detail by 10 CFR 50.36(c)(5) or by NUREG-1431, a reference to 10 CFR 50.36(c)(1) is added to TS 2.1.1 and 2.1.2, in order to ensure that notification, reporting, and unit restart authorization requirements associated with exceeding a safety limit are clearly identified. The change is acceptable because 10 CFR 50.36 ensures that safety limits are clearly identified.

The licensee proposed to delete the requirements of TS 6.9.2 for "SPECIAL REPORTS" for the following changes:

- Moderator Temperature Coefficient (3.1.1.3.a.3) (A)
- Remote Shutdown System (3.3.3.5.b) (A),
- Action Statements (Table 3.3-10, Action 41.a, b.2 and Action 42.a) (A),
- Steam Generator (4.4.5.5.a.b., and c) (A)

Over Pressure Protection Systems (3.4.9.3.f) (A)

ECCS Subsystems -  $T_{AVG}$  Greater Than or Equal to 350°F (3.5.2 Action b.) (A)

ECCS Subsystems -  $T_{avg}$  Less Than 350°F (3.5.3.1 Action c.) (A)

The references to the requirement of TS 6.9.2 for "SPECIAL REPORTS" specifying where a report to the NRC is sent have been removed from the above TSs. Changes to that information is controlled under 10 CFR 50.4. Accordingly, this change is acceptable.

### Electrical Power Systems

3.8.1.1.g (M) The licensee proposes to add this TS by adding a new LCO action statement, which states, "With one or more diesel generator fuel oil storage tanks with stored fuel oil total particulates not within the Diesel Fuel Oil Testing Program limits, within 7 days restore the fuel oil total particulates within limits, or declare the associated standby diesel generator(s) inoperable." The current TS does not require a standby diesel generator to be declared inoperable if fuel oil properties cannot be restored within a certain time period, but plant procedures do contain this provision. This action statement is acceptable because it assures the operability of the diesel generators in accordance with 10 CFR 50.36.

3.8.1.1.h (M) The licensee proposes to revise this TS by adding a new LCO action statement, which states: "With one or more diesel generator fuel oil storage tanks with new fuel oil properties not within the Diesel Fuel Oil Testing Program limits, within 30 days restore the fuel oil properties within limits, or declare the associated standby diesel generator(s) inoperable." The current TS does not require a standby diesel generator to be declared inoperable if fuel oil properties cannot be restored within a certain time period, but plant procedures do contain this provision, however, this action statement is acceptable and follows the guidelines of NUREG-1431.

### 3.1 TS Section 6.1 - Responsibility

6.1.1 (A) (R) The licensee proposes to relocate one sentence from 6.5.3.1.b and one from 6.5.3.1.c and combine them in TS 6.1.1 to read, "The plant manager or the plant manager's designee shall approve, prior to implementation, each proposed test and experiment that affects nuclear safety and is not described in the UFSAR, and each modification to systems or equipment that affects nuclear safety." This change does not change the substance of the TS, and, therefore, is acceptable. This change also follows the guidelines of NUREG-1431. The licensee also proposes to change the capitalization of "Plant Manager" to "plant manager" as described in the plant's Operational Quality Assurance Program (OQAP) and the UFSAR. Personnel who fill this position meet the specific qualification in TS 6.3.1. This editorial change is acceptable because it improves the format, functionality and readability of the TS and follows the guidelines of NUREG-1431.

6.1.2. (A) (L) The licensee proposes to change the capitalization of "Shift Supervisor" to "shift manager," replacing the specific position title with a generic title. The licensee indicates that personnel who fulfill this position meet the specific qualifications detailed in American National Standards Institute (ANSI), Standard N18.1-1971, as described in their OQAP. The licensee relocated (from Table 6.2-1) a paragraph identifying that during the absence of the shift manager from the control room while the unit is in Mode 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. The licensee also proposed to delete the sentence, "A management directive to this effect, signed by the President and Chief Executive Officer shall be reissued to all station personnel

on an annual basis.” These TS changes are acceptable because specific titles are not required to be in the TS to provide adequate protection of the public health and safety. These changes follow the guidelines of NUREG-1431.

### 3.2 TS Section 6.2 - Organization

6.2.1 (A) The licensee proposes to reformat the subsection title “Offsite and Onsite Organizations,” to assign a TS section number. This change is acceptable since it is administrative and does not change the meaning of the TS. The change follows the guidelines of NUREG-1431.

6.2.1.a (A) (R) The licensee proposes to make various grammatical and readability improvements. The licensee also proposes to change “These requirements shall be documented in the FSAR” to “These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR and/or the Operations Quality Assurance Plan.” This change provides clarification to the existing TS 6.2.1.a organization requirement. The specific position titles have been relocated to the UFSAR or OQAP. Changes to that information are controlled under 10 CFR 50.59 or 50.54, respectively. This is acceptable.

6.2.1.b (A) The licensee proposes to change the capitalization of “Plant Manager” to “plant manager,” replacing the specific position title with a generic title. The licensee also proposes to make various grammatical improvements. These editorial changes do not change the meaning of the TS, are acceptable and follow the guidelines of NUREG-1431.

6.2.1.c (A) (R) The licensee also proposes to make editorial changes to improve grammar and readability and to change “Vice President, Nuclear Generation” to a specified corporate officer. Specific position titles have been relocated to the OQAP and the UFSAR. These editorial changes do not change the meaning of the TS, are acceptable, and follow the guidelines of NUREG-1431.

6.2.1.d (A) The licensee proposes to replace the phrase “health physics... functions” to “radiation protection functions,” and made an additional editorial change to improve the readability. The proposed changes are administrative, with no impact of their own, and follow the guidelines of NUREG-1431.

6.2.2 (A) The licensee proposes to reformat this TS to have a number instead of only a subsection title and change “The unit staff shall be as follows,” to “The unit staff organization shall include the following:.” This additional information provides greater clarity. These changes do not change the meaning of the TS, are acceptable and follows the guidelines of NUREG-1431.

6.2.2.a (A) The licensee proposes to delete the sentence, “Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.1,” as well as the related Table 6.2.1. The licensee proposes to relocate information from Table 6.2.1 regarding non-licensed operators to TS 6.2.2.a, information about short duration mainly less than requirements to TS 6.2.2.6, and a balance of the shift manager to TS 6.1.2. These changes do not change the meaning of the TS, are acceptable, and follows the guidelines of NUREG-1431.

6.2.2.b (A) The licensee proposes to delete an unnecessary sentence regarding operator and senior operator staffing requirements. This is an administrative change because 10 CFR 50.54(k), (l), and (m) contain shift staffing requirements. Accordingly, these are acceptable administrative changes that follow the guidelines of NUREG-1431.

6.2.2.c (A) (R) The licensee proposes to replace the specific position title of “Health Physics Technician” with the generic title of “radiation protection technician.” In addition, the licensee proposes to relocate information about the maximum time the position is allowed to be unmanned from a footnote to the text of this TS. These proposed changes are administrative as other licensee controlled documents will contain the specific position title and the substance of the TS remains unchanged. Accordingly, these proposed changes are acceptable and follow the guidelines of NUREG-1431.

6.2.2.d (A). The licensee proposes to delete TS 6.2.2.d, which states that, “All Core Alterations shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.” This information is redundant with 10 CFR 50.54(m)(2)(iv). This change is acceptable and follows the guidelines of NUREG-1431.

6.2.2.e (R) The licensee proposes to relocate current TS 6.2.2.e and the associated footnote regarding requirements for fire brigade composition to the TRM. The licensee also proposes to relocate the fire protection systems TS requirements to the UFSAR and Fire Hazards Analysis Report from the TS in accordance with Generic Letter (GL) 88-12, “Removal of Fire Protection Requirements from the Technical Specifications.” The Fire Hazards Analysis Report delineates the commitment to 10 CFR Part 50, Appendix R, which specifies, in Sections III.G and III.L, staffing requirements related to the fire brigade and safe shutdown. These requirements do not need to be reiterated in the TS to provide adequate protection of public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The licensee categorized the proposed TS change for Item 25 as a relocated TS change, where the relocation of applicable TS requirements to other licensee-controlled documents is appropriate. The NRC staff reviewed this proposed TS change and determined that the licensee’s rationale for relocating the current fire brigade composition requirements from the TS to the TRM is valid. Therefore, the staff finds that the proposed TS change for Item 25 is acceptable, and follows the guidelines of NUREG-1431.

6.2.2.f (A) (L) (R) The licensee proposes to make several editorial changes for clarity. The licensee also proposes to replace a paragraph with “The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.” The licensee also proposes to eliminate details specifying responsibility for review of overtime because these aspects are controlled by plant procedures. Details of periodicity of overtime reviews and the personnel required to perform such reviews are outside the scope of information required to be in the TS. These changes are acceptable and follow the guidelines of NUREG-1431.

6.2.2.g (R) The licensee proposes to replace the list of required SRO or reactor operator license holders with the statement that “The individual to whom the shift managers directly report shall hold an SRO license.” The licensee states that the intent of this replacement is for the first level of management above the shift managers to hold an SRO license: functions of that position are currently defined in the OQAP and the UFSAR. This change is acceptable because it achieves the intended purpose of the TS requirement, it also follows the guidelines of NUREG-1431.

6.2.4.1 (A) The licensee proposes to make editorial changes to incorporate plant-specific nomenclature and to replace the qualifications requirement for the Shift Technical Advisor to follow

NUREG-1431 in referencing GL 86.04. This change does not affect the substance of the TS, and is acceptable.

Table 6.2-1 (A) (R) The licensee proposed to delete current TS Table 6.2-1 because information from the table has duplicated wording that has been transferred to TS 6.2.2.c. In addition 10 CFR 50.54(k), (l), and (m) define the regulatory requirements for licensed operators. Accordingly, this change is acceptable.

### 3.3 TS Section 6.3 - Unit Staff Qualifications

6.3.1 (M) The licensee proposes to add the statement, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as described in the Operations Quality Assurance Plan." This change is an additional restriction and is acceptable.

### 3.4 TS Section 6.4 - Training

6.4 (R) The licensee proposes to relocate the requirements of TS 6.4 to the licensee controlled TRM. The relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provision of 10 CFR 50.59. Accordingly, these changes are acceptable.

### 3.5 TS Section 6.5 - Review and Audits

6.5 (A) (R) The licensee proposes to delete and relocate the program review and audit requirements (including those related to the Offsite Dose Calculational Manual [ODCM], PCP, and Radiological Environmental Monitoring programs) to the licensee controlled QAP. In accordance with the criteria in 10 CFR 50.36(c)(2)(ii) and the guidance contained in GL 89-01 and NUREG-1431, the detailed program requirements do not warrant inclusion in the TS. Therefore, the proposed change is acceptable. However, 10 CFR 50.34 requires the design of the facility to be described in the UFSAR. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 (Criteria III, V, and VI) require the plant design to be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved QA plan (UFSAR Chapter 17). Further, Appendix B, Criterion XVIII, requires the licensee to carry out a comprehensive system of planned and periodic audits to verify compliance with the QA program. Section 10 CFR 50.59 specifies controls for changing the facility as described in the UFSAR, while 10 CFR 50.54(a) specifies criteria for changing the QA plan. Consistent with these regulations, the licensee proposes to relocate the following sections of the CTS intact to the licensee's quality assurance program description:

6.5.1 (R) Plant Operations Review Committee (PORC)

6.5.2 (R) Nuclear Safety Review Board (NSRB)

6.5.3 (R) Technical Review and Control

6.8.2 (R) Procedure Reviews and Approval

6.10 (R) Record Retention

Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," addresses the above relocations and provides a safety evaluation for use as a guide to prepare a plant-specific safety evaluation for such amendment requests. The NRC staff has reviewed the proposed relocations identified above and finds them to be consistent

with the guidance provided by AL 95-06. After these requirements are relocated to the QA program description, subsequent changes will be controlled pursuant to the established change control process of 10 CFR 50.54(a). The revision to the QA program, which incorporates the relocated administrative control requirements, should be made effective on a schedule consistent with implementation of the proposed license amendment. In view of the above, the proposed changes are acceptable and consistent with 10 CFR 50.36(c)(5), NUREG-1431, and GL 89-01.

### 3.6 TS Section 6.6 - Reportable Event

6.6 and 6.6.1.a (A) The licensee proposes to delete the Section 6.6 heading and TS 6.6.1.a, and replace them with "Not Used." The change does not affect any substitute requirements, and is acceptable.

6.6.1.b (R) The licensee proposes to relocate the requirement to the licensee controlled OQAP. The relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54(a). Accordingly, the proposed changes are acceptable.

### 3.7 TS Section 6.7 - Safety Limit Violation

6.7.1 (A) The licensee proposes to delete the title of TS 6.7.1 and the details in TS 6.7.1 and relocate remaining requirements to the OQAP, because they duplicate the requirements of 10 CFR 50.36, 50.72, and 50.73. Because the requirements proposed for deletion are redundant to the regulations, this change is acceptable.

6.7.1 a, b, c (L) (A) The licensee proposes to delete all unnecessary details concerning the reporting and review requirements of the safety limit violation as they pertain to Station Management, PORC, and the NSRB. These details are not necessary to assure operation of the facility in a safe manner as specified in 10 CFR 50.36(c)(5), are not necessary to adequately describe the regulatory requirements related to exceeding the criteria safety limit as specified in 10 CFR 50.36(c)(1). PORC and NSRB review requirements, which are currently detailed in TS 6.5.1 and TS 6.5.2, are being relocated to the OQAP, as discussed above. Therefore, these details can be deleted without a significant impact on safety. The proposed change is acceptable.

6.7.1.d (A) The licensee proposes to add a reference to 10 CFR 50.36(c)(1) to TS 2.1.1 and 2.1.2, in order to ensure that notification, reporting, and unit restart authorization requirements associated with exceeding a safety limit are clearly identified. The proposed change is acceptable.

### 3.8 TS Section 6.8 - Procedures, Program, and Manuals

6.8 (A) The licensee proposes to change "PROCEDURES AND PROGRAMS" to "Procedures, Programs, and Manuals." This is an editorial change to improve the format, functionality and readability of the TS and is acceptable. The licensee also proposes to delete the requirements of TS 6.8.1.c and 6.8.1.d regarding implementation of a Security Plan and an Emergency Plan. Since the Security Plan and the Emergency Plan are required to be implemented pursuant to 10 CFR 50.54(p) and 10 CFR Part 50, Appendix E, specific identification of these plans are unnecessary. This is a change in the presentation of the requirements only; it is an editorial change for implementation of the Security Plan and the Emergency Plan. Accordingly, the proposed changes are acceptable.

6.8.1.e (R) (M) The licensee proposes to relocate the requirement for the PCP implementation to the licensee-controlled TRM. In accordance with the criteria in 10 CFR 50.36(c)(2)(ii) and the guidance contained in GL 89-01 and NUREG-1431, the detailed program requirements do not warrant inclusion in the TS. Accordingly, the proposed change is acceptable.

Add new TS 6.8.1.e "Programs and Manuals Specified in TS 6.8.3." New TS 6.8.1.e is added to ensure all programs and manuals specified in TS 6.8.3 have written procedures. This change is acceptable because it is an additional safety restriction on plant operation that will be controlled through the TS. This is acceptable and follows the guidelines of NUREG-1431.

6.8.1.f (A) The licensee proposes to delete the ODCM implementation from this TS. In accordance with the criteria in 10 CFR 50.36(c)(2)(ii) and the guidance contained in GL 89-01 and NUREG-1431, the detailed procedural requirements do not warrant inclusion in the TS. Accordingly, the proposed change is acceptable; it also follows the guidelines of NUREG-1431.

6.8.3.a (A) The licensee proposes to make editorial changes to improve grammar and readability. Editorial changes are acceptable because they enhance the format, functionality and readability of the TS. Accordingly, the proposed changes are acceptable, and they follow the guidelines of NUREG-1431.

6.8.3.b. (R) The licensee proposes to relocate the requirements for In-Plant Radiation Monitoring to a licensee controlled document (TRM). In accordance with the criteria in 10 CFR 50.36(c)(2)(ii) and the guidance in GL 89-01 and NUREG-1431, the detailed procedural requirements do not warrant inclusion in the TS. Accordingly, the proposed change is acceptable.

6.8.3.c (A) The licensee proposes to make an editorial change to improve grammar and readability (see 6.8.3.1).

6.8.3.e (R) The licensee proposes to relocate the details concerning Accident Monitoring Instrumentation from 6.8.3.e to the TRM. These details need not be included in TS to assure operation of the facility in a safe manner. In addition, changes to the TRM will be controlled by the provisions of 10 CFR 50.59. Accordingly, the proposed change is acceptable; it also follows the guidelines of NUREG-1431.

6.8.3.f (R) (A) The licensee proposes to relocate the details regarding component cyclic or transient limit program from TS 6.8.3.f to UFSAR Section 3.9.1. The licensee will retain the program requirements in the TS but will relocate the specific detailed design limits to the UFSAR. Subsequent changes to the UFSAR will be controlled by the provisions of 10 CFR 50.59. Additionally, the proposed revision includes editorial changes to improve grammar and readability, but does not change the substance of the TS. In view of the above, this change is acceptable.

6.8.3.g. (A) The licensee proposes to make minor word changes to the Radioactive Effluent Controls Program TS to conform with the terminology in the STS. Accordingly, the change is acceptable.

6.8.3.h (R) The licensee proposes to relocate the requirements for the Radiological Environmental Monitoring Program to the licensee-controlled ODCM. In accordance with the criteria in 10 CFR 50.36(c)(2)(ii) and the guidance contained in GL 89-01 and NUREG-1431, the detailed program

requirements do not warrant inclusion in the TS. Accordingly, the proposed changes are acceptable.

6.8.3.i.a (A) The licensee proposes to make an editorial change to replace the wording "Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has" in the current TS with "Acceptability of new fuel oil prior to addition to the diesel generator fuel oil storage tanks by determining that the fuel oil has." This proposed change improves grammar and readability and is acceptable, and it also follows the guidelines of NUREG-1431.

6.8.3.i.b (L) The licensee proposes to replace the wording, "Other properties for ASTM 2D fuel oil are within limits within 30 days following sampling and addition to storage tanks" in the current TS 6.8.3.i.b with "Within 31 days following addition of new fuel oil to the diesel generator fuel oil storage tanks, verify that the properties of the new fuel oil, other than those addressed in 6.8.3.i.1 above, are within the limits for ASTM 2D fuel oil; and." This proposed TS change extends the allowed completion time from 30 to 31 days to verify that diesel fuel sample properties comply with ASTM 2D. The proposed TS change is reasonable based upon the relatively small increase in time and the low probability of a major problem being identified that would prevent the diesel generator (DG) from performing its intended safety function. In addition, the requirement applies to fuel oil properties that would not have an immediate effect on DG operation and are typically associated with contaminated fuel oil degradation as a result of long-term storage. A failure to satisfy these criteria does not mean the fuel oil will not burn properly in the DG. Additionally, the proposed editorial changes improve grammar and readability. Based on the above, the proposed TS changes are acceptable, and they also follow the guidelines of NUREG-1431.

6.8.3.i.c (A) The licensee proposes to revise the clarifying statement, "The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies." The licensee also categorized the proposed TS change for this item as an administrative (non-technical) change, which clarifies the allowances for surveillance frequency extension and delay in entering an LCO when a surveillance is missed for the Diesel Fuel Oil Testing Program. The licensee stated that denoting these allowances as part of the current TS administrative control requirements is a change in presentation only and not a technical change. The licensee also stated that the proposed TS change is acceptable and follows the guidelines of NUREG-1431, as modified by NRC approved Technical Specification Task Force 118.

This proposed TS statement clarifies the allowances for surveillance frequency extension and delay in entering the LCO when a surveillance is missed. This TS change is necessary because the testing requirements are denoted in a TS section to which the SR statements of applicability generally do not apply. The associated testing and frequencies were moved from TS 3/4.8 in Amendment 68 for Unit 1 and Amendment 57 for Unit 2. Prior to these amendments, TS 4.0.2 and TS 4.0.3 were applicable allowances given that the amendment requests did not justify removing these allowances. Specifically, denoting these allowances in TS 6.8.3.i is considered a change of presentation only and not a technical change (either actual or interpretational). Accordingly, this change is acceptable.

6.8.3.j (A) The licensee proposes to replace the wording, "to implement the leakage rate testing..." with "implement leakage rate testing...", "10 CFR Part 50 with "10 CFR 50," and "primary containment" with "containment" in the current TS 6.8.3.j. These proposed TS changes improve readability, are therefore, acceptable, and follow the guidelines of NUREG-1431.

6.8.3.j. 2 (A) The licensee proposes to replace the wording, “test intervals” with “test frequencies” in current TS 6.8.3.j.b. This proposed change improves grammar and readability, and is therefore acceptable, and follows the guidelines of NUREG-1431.

6.8.3.n (A) The licensee proposes to delete ODCM from TS 1.19 and incorporate the text into TS 6.8.3.n. As discussed on page 3 of this safety evaluation, this change is acceptable.

### 3.9 TS Section 6.9 - Reporting Requirements

6.9.1 (A) This is an editorial change to improve grammar and readability. This change does not affect the substance of the TS and is acceptable, and follows the guidelines of NUREG-1431.

6.9.1.1 (R) Relocated the requirements of the Startup Report to the TRM. This report does not contribute to the safe operation of the facility; therefore, it need not be included in the TS. The relocated details are not required to be in the TS to provide adequate protection of the public health and safety. The provisions of 10 CFR 50.59 will control changes to the TRM. Based on the above, this change is acceptable, and it also follows the guidelines of NUREG-1431.

6.9.1.2 (A) The licensee proposes to change the report title from “Annual Report” to “Occupational Radiation Exposure Report.” The proposed change is administrative, and is acceptable.

6.9.1.2.a (L) The licensee also proposes to revise the TS by replacing the text and footnote to reflect requirements in 10 CFR Part 20 (dated June 20, 1991) and to add a required report submittal date of April 30. The proposed changes do not eliminate any existing requirements and merely provide consistency with 10 CFR 20.2206. As such the proposed changes are conforming changes, in accordance with the guidance contained in GL 89-01 and NUREG-1431 and are acceptable.

6.9.1.3 (A) The licensee proposes to delete and relocate to the front of this TS the footnote text, allowing a single submittal to be made. The licensee also proposes to delete the word “Routine” preceding “Annual Radiological Environmental Operating Reports” and to revise the paragraph to incorporate minor editorial changes. The proposed changes are administrative, with no impact of their own, and are acceptable.

The licensee proposes to change the Annual Radiological Environmental Operating Report submission date from “prior to May 1 of each year” to “prior to May 15 of each year.” The timing of the submission of the report does not have a significant effect on plant safety. Accordingly, the proposed change is administrative in nature, and is acceptable; it also follows the guidelines of GL 89-01 and NUREG-1431.

6.9.1.4 (A) The licensee proposes to delete and relocate to the front of this TS the footnote text, allowing a single submittal to be made. The proposed change has no effect on the substance of the TS, and it also follows the guidelines of NUREG-1431.

6.9.1.4 (A) (L) The licensee proposes to change the specification title from “Annual Radioactive Effluent Release Reports” to “Radioactive Effluent Release Report,” and make other editorial changes to incorporate the terminology of the STS. The proposed changes have no substantive effect and are acceptable; they also are consistent with the guidance in NUREG-1431. The licensee also proposes to change the report submission date from “within 60 days after January 1

of each year" to "by May 1 of each year." The timing of the submission of the report does not have a significant effect on plant safety. The proposed changes are acceptable and follow the guidelines of NUREG-1431.

6.9.1.5 (A) The licensee proposes to change the address for submission of a required monthly report on power operated relief valve challenges. The reporting address is now specified in 10 CFR 50.4. This is an administrative change, which does not affect the specification and is acceptable.

6.9.1.6 a (A) The licensee proposes to rephrase the statement that the core operating limits shall be documented in the COLR before each reload cycle. The editorial change improves readability. The licensee used the COLR abbreviation rather than spelling out "Core Operating Limit Report." The proposed change does not change the substance of the TS and is acceptable; it also follows the guidelines of NUREG-1431.

6.9.1.6.b (A) The licensee also proposes to make the editorial change: "...reviewed and approved by the NRC in:" to "reviewed and approved by the NRC, specifically those described in the following documents:" and to spell out "South Texas Project Electric Generating Station" and correct punctuation. These editorial changes improve readability and are acceptable.

6.9.1.6.c (A) The licensee proposes to spell out ECCS, "Emergency Core Cooling Systems" and to change "...margin, and transient and accident analysis..." to "margin, transient analysis limits, and accident analysis..." These editorial changes are acceptable.

6.9.1.6.d (A) The licensee proposes to substitute as described for TS 6.9.1.6.a "The Core Operating Limits Report." with "The COLR." The licensee proposes to specify where a report to the NRC is sent. Change "to the NRC Document Control Desk,..." to "to the NRC." These editorial changes are acceptable.

6.9.2 (A) The licensee proposes to delete the requirements of TS 6.9.2 for "SPECIAL REPORTS." The requirement specifying where a report to the NRC is sent has been removed since it is redundant to the requirements of 10 CFR 50.4. Therefore, all references to TS 6.9.2 are deleted. The revision of this requirement provides editorial changes to improve grammar and readability. This change is acceptable and follows the guidelines of NUREG-1431.

### 3.10 TS Section 6.10 - (R) Record Retention

6.10 (R) The licensee proposes to delete and relocate the Record Retention requirements to the licensee-controlled OQAP. As discussed on page 8 of the safety evaluation, this is acceptable.

### 3.11 TS Section 6.11 (A) Radiation Protection Program

6.11 (A) The license proposes to delete the details contained in TS 6.11, "Radiation Protection Program." These requirements duplicate the requirements of 10 CFR Part 20. Since deletion of the duplication results in no actual change in the requirements, this is considered an editorial change. The proposed change is acceptable and follows the guidelines of NUREG-1431.

### 3.12 TS Section 6.12 (A) High Radiation Area

6.12 (A) The licensee proposes to revise the list of control options specified in TS 6.12.1 by adopting the options provided in the STS. The proposed changes are consistent with the criteria in 10 CFR 20.1601(b) and (c) and the guidance contained in NUREG-1431 and in Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas of Nuclear Plants." The licensee also proposes several editorial changes to (1) improve the readability of the TS and (2) reflect generic position descriptions consistent with TS 6.2.2.c. These proposed changes are consistent with the Commission's regulations, administrative in nature, and are therefore, acceptable.

### 3.13 TS Section 6.13 (R) Process Control Program

6.13 (R) The licensee proposes to delete this TS and relocate the requirements for a PCP to the licensee-controlled TRM. These requirements need not be included in TS to assure operation of the facility in a safe manner. Accordingly, the proposed change is acceptable, and it also follows the guidelines of GL 89-01 and NUREG-1431.

### 3.14 TS Section 6.14 (A) (R) Offsite Dose Calculation Manual

6.14 (A) (R) The licensee has proposed to delete this TS and consolidate and relocate the programmatic requirements for maintaining the ODCM into TS 6.8.3.n. The proposed changes are consistent with the guidance contained in GL 89-01 and NUREG-1431. Aspects related to PORC review have been relocated to the OQAP as evaluated in page 8 of this safety evaluation. These requirements need not be included in TS to assure operation of the facility in a safe manner. The proposed changes are acceptable.

The licensee also proposes to change the capitalization of "Plant Manager" to "plant manager," replacing the specific position title with a generic title. The description associated with this specific title is in the licensee's OQAP and UFSAR. This proposed change does not affect the substance of the TS and is acceptable. This change is consistent with NUREG-1431 and is acceptable. The licensee also proposes to delete and relocate (R) the procedural details of this specification to the UFSAR. In accordance with the criteria in 10 CFR 50.36(c)(2)(ii) and the guidance contained in GL 89-01 and NUREG-1431, the detailed procedural requirements do not warrant inclusion in the TS. Accordingly, the proposed change is acceptable.

## 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 proposed amendments change 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 previously issued a proposed finding that the amendments involve no significant hazards

consideration, and there has been no public comment on such finding (67 FR 5335 dated February 5, 2002). The amendments also relate to changes in reporting or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (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.

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