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

July 27, 2004
NOC-AE-04001734

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Commitment Change Summary Report

Attached is the South Texas Project (STP) Commitment Change Summary Report for the period July 14, 2003 through July 15, 2004. This report lists each commitment for which a change was made during the reporting period and provides the basis for each change.

The commitments were evaluated in accordance with the requirements of STP's Regulatory Commitment Change Process, which is consistent with the guidance in the Nuclear Energy Institute's "Guideline for Managing NRC Commitments", NEI 99-04. Additional documentation is available at STP for your review.

This report includes two commitment changes that were not included in previous reports. STP Nuclear Operating Company identified two commitments made in response to Generic Letter 81-7, Control of Heavy Loads that were changed in the past without being evaluated in accordance with NEI 99-04. A commitment evaluation of these changes was subsequently performed which concluded that the proposed changes were appropriate and NRC prior approval was not required. This was documented and addressed in the corrective action program. These changes are included in the attached report.

If there are any questions, please contact Robyn Savage at 361-972-7438 or me at 361-972-7136.

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rds

Attachment: Commitment Change Summary Report

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ATTACHMENT 1

Commitment Change Summary Report

ATTACHMENT 1
COMMITMENT CHANGE SUMMARY REPORT

Condition Report Number	Source Document	Source Date	Date of Change	Original Commitment Description	Revised Commitment Description	Justification for Change
03-925	NOC-AE-03001493 LER 1-03-001	03/20/03	07/14/03	STPNOC plans to have changes made to the Shunt Reactor neutral over-current protective relay scheme to trip the Shunt Reactor Circuit Switcher instead of tripping the AC bus circuit breakers. Center Point Energy will implement this change to the scheme. This corrective action will be completed by July 15, 2003	Revised commitment due date to modify the neutral over-current protective relay schemes for the South Bus Shunt Reactor. To be completed no later than September 15, 2003.	The change in the scheduled completion date to modify the neutral over-current protective relay schemes for the North and South Bus Shunt Reactors was required because the STP Transmission Service Provider (Center Point Energy) could not change the protective relay scheme for the South Bus in time. The protective relaying scheme for the North Bus Shunt Reactor was changed in April 2003. Operation of the South Bus Shunt Reactor circuit switcher was not allowed and remained tagged out-of-service until the relaying scheme was changed. Therefore, the slip in schedule of two months did not adversely impact safety. The implementation of the change was actually completed on August 20, 2003.
02-16723-4	NRC Bulletin 80-10 NRC Open Item 498/8630-05 (c) Inspection Report 498/8630 (AE-HL-91029)	10/30/86	7/25/03	Include routine sampling and analysis requirements in 0PCP01-ZA-0014 for the following systems to identify any contaminating events which could lead to unmonitored, uncontrolled releases to the environment: Component Cooling Water (CCW), Essential Cooling Water (ECW), Turbine Generator Building (TGB) Sumps, Demin Water (DW), Auxiliary Boiler, Condensate Polisher Regeneration Waste, and Boron Recycle System (BRS) and Liquid Waste Processing System (LWPS) Steam Condensate.	Include routine sampling and analysis requirements referenced to NRC Bulletin 80-10 in the Chemistry schedule to be controlled via 0PCP01-ZA-0014 for the following systems to identify any contaminating events which could lead to unmonitored, uncontrolled releases to the environment: ECW, DW, Auxiliary Boiler, Fuel Handling Building (FHB) HVAC Drains, Sanitary Waste, Potable Water, Plant Nitrogen, Instrument Air, and Service Air. CCW, TGB Sumps and Condensate Polisher Regeneration Waste will be monitored using the radiation monitors associated with those respective systems via the Radiation Monitoring System.	Three systems were removed from the list for routine sampling and analysis and are being monitored to meet NRC Bulletin 80-10 requirements. These systems (CCW, TGB Sumps, and Condensate Polisher Regeneration Waste) have installed radiation monitors, which monitor for system contamination. Procedures are in place to use and respond to these monitors to identify any contamination events and to prevent unmonitored, uncontrolled releases to the environment. These monitors meet the requirements of the NRC Bulletin 80-10 which allows either sampling/analysis or monitoring programs to be used. Additional systems (FHB HVAC Drains, Sanitary Waste, Potable Water, Plant Nitrogen, Instrument Air, and Service Air) have been added to the original systems committed to for sampling and analysis. This is a result of re-evaluations of NRC Bulletin 80-10 applicability performed since the initial commitment. BRS and LWPS Steam Condensate systems have been removed from the list since they have been isolated and are no longer used. The requirements for sampling and analysis and the reference to NRC Bulletin 80-10 are contained in the schedule itself and not in the referenced procedure. The referenced procedure controls changes to the schedule. This has been clarified.
98-6902 98-16721 03-16156	NOC-AE-000176 LER 1-98-004 NOC-AE-000355 LER 1-98-010	6/01/98 11/23/98	01/26/04	A review of existing periodic and preventive maintenance performed on these motors was conducted. Several enhancements were identified for development. These include: * Revising the lube/inspection activity.	A review of existing periodic and preventive maintenance performed on these motors was conducted. Several enhancements were identified for development. These include:	The change in the preventive maintenance items for the booster fan motors is consistent with the EPRI NP 7502, Electric Motor Predictive and Preventive Maintenance Guide. This guide recommends for Safety-Related motors, under 200 HP and less than 600 volts that

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				* Developing new yearly PM activities for insulation resistance testing the booster fan motors. * Developing new three year PM activities to perform DC step voltage testing. .	* Revising the lube/inspection activity. * Developing PM activities for meggering the booster fan motors at a frequency consistent with current EPRI standards.	insulation resistance checks be performed at a 24 - 36 month frequency. No DC step voltage tests are recommended for this size motor and could actually be detrimental to the motor. The PM recommendations are also consistent with the STP motor monitoring procedure for this size motor. It has been determined that the insulation design and manufacturing quality of the motors was inadequate and had resulted in several motor grounds. All the booster fan motors were upgraded using STP specifications and replaced. This has improved the booster fan motor reliability. No problems have been identified during the performance of the PMs on the motors since replacement. <u>Additional Information:</u> Technical Specification (TS) 3.7.8 has been revised and allows for a 7 day LCO for the loss of one FHB exhaust ventilation train and has provisions under TS 3.7.8.d for a 12 hour LCO when more than one FHB exhaust ventilation train is inoperable. This has eliminated the need to enter TS 3.0.3 to perform maintenance on the booster fans which was the basis for LER 98-004 and LER 98-010. The time allowed under the TS LCO's is adequate to effect repairs in the event of a booster fan failure. Procedures are in place to isolate the booster fans for maintenance. Modifications to the FHB Exhaust Air system have been performed in both Units, which allow installation of maintenance barriers for FHB exhaust booster fan removal.
03-5296	Generic Letter 81-07 ST-HL-AE-1129 ST-HL-AE-718	10/19/84	08/23/99	STPs response to Generic Letter 81-07 (ST-HL-AE-1129) included Table 1 which contained a list of overhead handling systems capable of carrying heavy loads over safe shutdown or decay heat removal equipment. Polar cranes were the only cranes included in Table 1 for the reactor containment building.	Allow use of jib cranes for certain heavy loads within the the reactor containment building. In addition to the polar crane, two jib cranes are installed in each reactor containment building (RCB). These cranes are allowed to handle certain heavy loads with restrictions as given in procedure 0PGP03-ZA-0069, Control of Heavy Loads.	At the time that the original control of heavy loads program submittal was prepared many aspects of actual refueling outages were not fully understood. This was recognized in the cover letter (ST-HL-AE-1129) which stated: As the STP design is not yet complete, there may be a need to add or modify load handling systems. In the event this becomes necessary, the new load handling system and modifications will consider the guidance of Generic Letter 81-07. It was necessary to change some aspects of the original response in order to allow more flexibility for outage activities and to enhance personnel safety since loads can be moved during times of low worker traffic inside

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						the containment. The evaluation of the changes used the Guidance of Generic Letter 81-07 which concluded that the change is appropriate. The NRC recognized that actions such as this would be necessary in Generic Letter 85-11 that closed out Phase II of NUREG 0612, Control of Heavy Loads at Nuclear Power Plants. The STP heavy loads evaluation was sent to the NRC by letter ST-HL-AE-1129 dated October 19, 1984, "Submittal of Revised Response to Generic Letter 81-07, Control of Heavy Loads." The STP procedure that promulgates the heavy loads program is procedure 0PGP03-ZA-0069, Control of Heavy Loads. The licensing submittal and the procedure are consistent with the guidelines given in NUREG-0612. The submittal was accepted by the NRC in SER Section 9.1.5 and Appendix F. The STP program for Control of Heavy Loads goals are to greatly reduce the chances for a load drop by using good design and maintenance and to show that a load drop could be sustained (no fuel damage or loss of safe shutdown capability) even if there was an extremely unlikely heavy load drop. The use of the jib cranes to move heavy loads inside containment was previously evaluated in 1999 using 10CFR50.59 (USQE 99-1371-3) using the guidance of Generic Letter 81-07.
03-5296	Generic Letter 81-07 ST-HL-AE-1129 ST-HL-AE-718	10/19/84	01/15/01	STPs response to Generic Letter 81-07, (ST-HL-AE-1129) page 18 of the attachment re: "Submittal of Revised Response to Generic Letter 81-07, Control of Heavy Loads" included the following: "Three trains of RHR are provided, only one of which is required for decay heat removal. If a load must be moved over an RHR train when both redundant trains are not available (i.e. other train(s) are inoperable, or a load drop could impact all operable trains), the polar crane main hoist will be used in conjunction with adequate interfacing lift points to ensure that greater than a 10/1 safety factor is provided."	Allow use of polar crane auxiliary hoist. "Three trains of RHR are provided, only one of which is required for decay heat removal. If a load weighing 15,000 lbs. or more must be moved over an RHR train when both redundant trains are not available (i.e. other train(s) are inoperable, or a load drop could impact all operable trains), the polar crane main hoist will be used in conjunction with adequate interfacing lift points to ensure that greater than a 10/1 safety factor is provided. For loads weighing less than 15,000 lbs. which must be moved over an RHR train when both redundant	It was necessary to change some aspects of the original response in order to allow use of the polar crane auxiliary hoist to carry certain loads that were previously restricted to the main hoist. This allows more flexibility for outage activities and enhances personnel safety since loads can be moved during times of low worker traffic inside the containment. The Auxiliary Hoist is allowed to carry loads less than 15,000 lbs. since it will still maintain a safety factor of greater than 10/1. This change was previously evaluated in December 2000 for Revision 15 of the 0PGP03-ZA-0069 using 10CFR50.59 (USQE 00-3225-4). Based on the evaluation of the change using the guidance of Generic Letter 81-07, it was concluded that the proposed change was appropriate.

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					trains are not available, the polar crane auxiliary hoist may be used in lieu of the main hoist in conjunction with adequate interfacing lift points to ensure that greater than a 10/1 safety factor is provided."	
03-5296	Generic Letter 81-07 ST-HL-AE-1129 ST-HL-AE-718	10/19/84	02/12/04	STP's response to Generic Letter 81-07 (ST-HL-AE-1129) page 18 of the attachment re: "Submittal of Revised Response to Generic Letter 81-07, Control of Heavy Loads" included the following: "Three trains of RHR are provided, only one of which is required for decay heat removal. If a load must be moved over an RHR train when both redundant trains are not available (i.e. other train(s) are inoperable, or a load drop could impact all operable trains), the polar crane main hoist will be used in conjunction with adequate interfacing lift points to ensure that greater than a 10/1 safety factor is provided."	Allow the RCP motor engineered lift to move over RHR equipment. Three trains of RHR are provided, only one of which is required for decay heat removal. If a load must be moved over an RHR train when both redundant trains are not available (i.e. other train(s) are inoperable, or a load drop could impact all operable trains), the polar crane main hoist will be used in conjunction with adequate interfacing lift points to ensure that greater than a 10/1 safety factor is provided. The RCP Motor Engineered Lift is an exception to this 10/1 safety factor requirement.	The Reactor Coolant Pump (RCP) motor lift is defined in the Control of Heavy Loads procedure (0PGP03-ZA-0069) as an Engineered Lift that utilizes special designed and dedicated components among other attributes such as special inspections and tests, personnel dedicated for this activity, use of a safe load path, special communication during the lift, and increased attention and oversight. The change is that some components of the lift do not have a 10/1 safety factor. The electric hoist that goes from the motor lift rig to the polar crane hook was designed by Ingersoll-Rand to industry standard ANSI B30.9 and has a 5/1 safety factor. The special lift rig was designed by Westinghouse to ANSI N14.6 and has a 5/1 safety factor. The guidelines of NUREG 0612 call for decreasing the chances of a load drop by using good design, maintenance instructions, testing, and inspection of the lifting components. The standard commercial component has a 5/1 safety factor. To achieve added assurance for routine rigging activities, redundant components (each with a safety factor of 5/1) may be used or a component with twice the capacity (safety factor of 10/1) may be used. This is for routine rigging activities. In contrast, the RCP Motor Engineered Lift is a controlled, special rigging activity. This lift is not a routine rigging activity but rather is an Engineered Lift that has special attributes as mentioned above and as given in procedure 0PGP03-ZA-0069. This engineered lift utilizes dedicated components that are inspected and tested prior to lift. Incorporating these attributes into the lift decreases the chances for a load drop. The special lift rig devices described in the submittal to the NRC are designed to ANSI N14.6 and have safety factors of 5/1. This is also true for the RCP Motor Lift Rig. This is as given in the guidelines of NUREG 0612. The RCP Motor lift rig is a dedicated piece of rigging equipment that is utilized for the particular lift. It is tested and inspected prior to use. Similarly the electric hoist made by Ingersoll-Rand per ANSI B30.16 is also a

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						dedicated piece of rigging equipment that is utilized for this particular lift. The electric hoist is load tested and inspected prior to use in moving the RCP Motor. The control of heavy loads program philosophy also includes evaluation for the possible effects of a load drop even if it is made highly unlikely. The RCP Motor Engineered Lift includes the requirement for an available flowpath from the emergency sump and LHSI Pump to the RCS main loop piping. This method would be used to recirculate water back into the RCS piping if an unlikely load drop caused a pipe leak. The safe load path for RCP Motor movement avoids travel over or adjacent to spent fuel, calls for travel over concrete floors rather than over grating or metal decking, and minimizes travel over safe shutdown equipment. The RCP Motor Engineered Lift contributes to managing the risk from performing the maintenance activity of replacing a RCP Motor. This would be evaluated along with other outage maintenance activities as part of a comprehensive shutdown risk assessment per procedure 0PGP03-ZA-0101. The risk evaluation may call for other measures to be in place when this activity occurs. For example, another RHR Train may need to be functional in addition to the one operable RHR Train. The Risk Management group determined that the estimated conditional core damage probability was 2E-07 for the RCP Motor lift in April 2003 during outage 1RE11. This value indicates a very low safety significance. The RCP Motor Engineered Lift meets the two aspects of the control of heavy loads guidelines given in NUREG 0612 of greatly reducing the chances for a load drop and of being able to sustain a highly unlikely load drop.
03-5296	Generic Letter 81-07 ST-HL-AE-1129 ST-HL-AE-718	10/19/84	02/12/04	STP response to Generic Letter 81-07 (ST-HL-AE-1129) states on page 4 that "...The Fuel Handling Building (FHB) overhead crane's 15-ton main hoist has been designed to meet the intent of Regulatory Guide 1.104, Rev. 0, i.e., single-failure proof cranes. No heavy loads have been identified for which the Auxiliary Hoist would be used; therefore, this hoist is not addressed in this report."	Allow use of the FHB Overhead Crane Auxiliary Hoist 2-ton auxiliary hoist to move heavy loads in the FHB truck bay. "The only heavy loads that have been identified for which the Auxiliary Hoist would be used are located within the FHB truck bay. No safe shutdown equipment or spent fuel is located in the FHB truck bay. Therefore, this hoist is not addressed in this report."	The original submittal stated that no heavy loads had been identified to be moved by the FHB Overhead Crane Auxiliary Hoist. Subsequently, heavy loads have been identified within the FHB truck bay for which the Auxiliary Hoist would be used. The procedure restricts heavy load use of this hoist to within the truck bay. Crane operators are trained on the use of the procedure and the safe load paths. Since no safe shutdown equipment and no spent fuel are located in the FHB truck bay, the procedure change is acceptable.