



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

September 30, 2004
NOC-AE-04001786
10CFR50.90
STI: 31788471

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
License Amendment Request to Eliminate the Requirements to provide Monthly
Operating Reports and Occupational Radiation Exposure Reports

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), STP Nuclear Operating Company (STPNOC) is submitting a request for an amendment to the Technical Specifications for South Texas Project Units 1 and 2.

The proposed amendment would delete the Technical Specification (TS) requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports. The proposed TS changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report, Revision 1". The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the Consolidated Line Item Improvement Process (CLIP).

Attachment 1 provides a description of the proposed changes and confirmation of applicability.

Attachment 2 provides the existing TS pages marked-up to show the proposed changes.

STPNOC requests approval of the proposed license amendment by March 15, 2005, and requests 90 days for implementation of the amendment after it is approved.

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The STPNOC Plant Operations Review Committee has reviewed and concurred with the proposed change to the Technical Specifications.

In accordance with 10 CFR 50.91(b), STPNOC is notifying the State of Texas of this request for license amendment by providing a copy of this letter and its attachments. If there are any questions regarding the proposed amendment, please contact Mr. S. M. Head at (361) 972-7136 or me at (361) 972-7902.

This application includes a new commitment to provide operating data described in Generic Letter 97-02 to the NRC via an industry database.

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

Executed on September 30, 2009


T. B. Jordan
Vice President,
Engineering & Technical Services

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-up)
3. Proposed Technical Specification Changes

cc:
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ATTACHMENT 1
Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) 6.9.1.2 for an annual report on occupational radiation exposures and TS 6.9.1.5 for a monthly report of operating statistics and shutdown experience. The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report, Revision 1". The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 6.9.1.2 Occupational Radiation Exposure Report ----Deleted

TS 6.9.1.5 Monthly Operating Reports ----Deleted

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, STPNOC is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258 "Changes to Section 6.0, Administrative Controls". Specifically, TS 6.9.1.5 includes a requirement to include in the monthly operating reports any challenges to pressurizer power operated relief valves or pressurizer safety valves. The NRC safety evaluation for TSTF-258 addressed the removal of the requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief or safety valves. The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067) and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

STPNOC is proposing not to renumber the Specifications in Section 6.9 as proposed in TSTF-369, Revision 1. Renumbering of the Specifications in Section 6.9 would result in additional unnecessary procedure changes.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

STPNOC has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. STPNOC has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to South Texas Project Units 1 and 2 and justify this amendment for the incorporation of the changes to the STP TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, STPNOC is making the following regulatory commitment:

1. STPNOC is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)) The regulatory commitment to provide the operating data is described in Generic Letter 97-02 will be included in the Technical Requirements Manual.
2. STP does not have different reactor types or both operating and shutdown reactors.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

STPNOC has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. STPNOC has concluded that the proposed determination presented in the notice is applicable to STP and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

STPNOC has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. STPNOC has concluded that the staff's findings presented in that evaluation are applicable to STP and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. STPNOC is not proposing variations or deviations from the TS changes described in TSTF-369 [and the limited portion of TSTF-258] or the NRC staff's model SE published on June 23, 2004 (69 FR 35067), except for minor TS section numbering differences associated with the STPNOC TS format.

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

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6.0 ADMINISTRATIVE CONTROLS

6.9 Reporting Requirements

6.9.1 The following reports shall be submitted in accordance with 10 CFR 50.4.

6.9.1.1 Not Used

6.9.1.2 Occupational Radiation Exposure Report Not Used

NOTE

~~A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.~~

.....

~~This report provides a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was required, receiving an annual deep dose equivalent greater than 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). The tabulation may include individuals for whom monitoring was provided but not required. This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.~~

6.9.1.3 Annual Radiological Environmental Operating Report

NOTE

A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.

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The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 15 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM) and 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and 1V.C.

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6.0 ADMINISTRATIVE CONTROLS

6.9 Reporting Requirements

6.9.1.4 Radioactive Effluent Release Report

--NOTE--

A single submittal may be made for the South Texas Project, which shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents, and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program, and be in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.I.

6.9.1.5 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power-operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

6.9.1.6 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle or prior to any remaining portion of a reload cycle. The core operating limits shall be documented in the COLR for the following:
 - 1. Safety limits for thermal power, pressurizer pressure, and the highest operating loop coolant temperature (T_{avg}) for Specification 2.1,
 - 2. Limiting Safety System Settings for Reactor Coolant Flow-Low Loop design flow, Overtemperature ΔT , and Overpower ΔT setpoint parameter values for Specification 2.2,
 - 3. SHUTDOWN MARGIN limits for Specification 3/4.1.1.1,
 - 4. Moderator Temperature Coefficient BOL and EOL limits, and 300 ppm surveillance limit for Specification 3/4.1.1.3,
 - 5. Shutdown Bank Insertion Limit for Specification 3/4.1.3.5,
 - 6. Control Bank Insertion Limits for Specification 3/4.1.3.6,
 - 7. Axial Flux Difference limits and target band for Specification 3/4.2.1,

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ATTACHMENT 3
PROPOSED TECHNICAL SPECIFICATION PAGES

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6.0 ADMINISTRATIVE CONTROLS
6.9 Reporting Requirements

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(continued)