



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

May 21, 2007
NOC-AE-07002156
10CFR50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Proposed Change to Surveillance Requirement 4.5.2.d

STP Nuclear Operating Company (STPNOC) submits the attached proposed amendment to South Texas Project Operating Licenses NPF-76 and NPF-80. This license amendment request proposes revising the Technical Specification (TS) Surveillance Requirement (SR) 4.5.2.d for the inspection of the Emergency Core Cooling System (ECCS) sumps for consistency with the new STP sump design.

Attachment 1 to this submittal includes the description, safety analysis, and determination of no significant hazards. The TS page markup is provided in Attachment 2.

STPNOC requests approval of the proposed amendment by December 31, 2007, consistent with the currently scheduled formal implementation of the revised ECCS sump design basis per the resolution of GSI-191.

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.

There are no commitments in this letter.

If there are any questions regarding the proposed amendment, please contact Mr. A. W. Harrison at (361) 972-7298 or me at (361) 972-7867.

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

Executed on 5/21/2007
Date



David W. Rencurrel
Vice President, Engineering
& Strategic Projects

Attachments:

1. Description of Changes and Safety Evaluation
2. Technical Specification Page Markup

cc:

(paper copy)

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ATTACHMENT 1

DESCRIPTION OF CHANGES

AND

SAFETY EVALUATION

1.0 Introduction

STPNOC has modified the ECCS sump design for STP Units 1 and 2. The new sump screen design does not include trash racks. However, SR 4.5.2.d includes trash racks in its parenthetical reference to sump components. STPNOC proposes an administrative change to delete the parenthetical reference to sump components in its entirety. The parenthetical reference is not a comprehensive list as evidenced by the "etc." and is a level of detail not needed for performance of the surveillance.

2.0 Description

SR 4.5.2.d currently reads:

At least once per 18 months by a visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or abnormal corrosion.

STPNOC proposes to revise SR 4.5.2.d to read:

At least once per 18 months by a visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components show no evidence of structural distress or abnormal corrosion.

3.0 Background

The original ECCS sump screen design included external grating around the sump suction screens that was referred to as a trash rack. In addition, the STP TS are based on the Westinghouse Standard TS described in NUREG-0452, which includes the wording currently in SR 4.5.2.d.

STPNOC redesigned the ECCS sump suction screens in response to the resolution of GSI-191. The new design differs significantly from the original design and does not include trash racks. The original sump screens have been removed and the new sump screen design is installed and in service in both STP units. As part of the overall adoption of the new sump inlet screen design, STPNOC is proposing a consistency change in the wording of the surveillance requirement.

4.0 Technical Analysis

The proposed change will delete the SR 4.5.2.d parenthetical reference to sump components, "(trash racks, screens, etc.)". In addition to removing the reference to the trash racks that are no longer part of the sump design, the change will remove unnecessary detail from the SR.

This is an editorial, administrative change. As described above, the trash racks are no longer in the design and are not included in the new sump screen design or installation. The parenthetical list of sump components currently in SR 4.5.2.d is clearly not a comprehensive list and is not necessary for the determination of what comprises sump components. The requirement that "...all necessary...other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s)" in the TS definition of OPERABLE – OPERABILITY provides adequate guidance to determine the sump components that are subject to SR 4.5.2.d.

5.0 Regulatory Safety Analysis

5.1 No Significant Hazards Determination

STPNOC has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10CFR50.92, "Issuance of amendment," as discussed below.

- 1) Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change is an administrative editorial change to remove unnecessary information from a surveillance requirement. It will not affect how any system, structure, or component is designed or operated and so has no potential to affect the mitigation of an accident. The change does not affect an initiator of any accident previously evaluated. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change is an administrative editorial change to remove unnecessary information from a surveillance requirement. It will not affect how any system, structure, or component is designed or operated or involve any new or different plant configurations. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3) Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change is editorial and administrative and consequently has no effect on the margin of safety.

Conclusion

Based upon the analysis provided herein, the proposed amendments do not involve a significant hazards consideration.

5.2 Applicable Regulatory Requirements/Criteria

Compliance with the regulatory requirements and criteria that are applicable to ECCS is not affected by the proposed change. As described above, the proposed change to SR 4.5.2.d is an administrative editorial change. The technical requirements of the revised SR continue to be met and the STP ECCS will continue to meet its design-basis requirements.

6.0 Environmental Considerations

10 CFR 51.22(b) specifies the criteria for categorical exclusion from the requirements for a specific environmental assessment per 10 CFR 51.21. This amendment request meets the criteria specified in 10 CFR 51.22(c)(9). The specific criteria contained in this section are discussed below.

(i) the amendment involves no significant hazards consideration

As demonstrated in the No Significant Hazards Consideration Determination, the requested license amendment does not involve any significant hazards consideration.

(ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite

The requested license amendment involves no change to the facility and does not involve any change in the manner of operation of any plant systems involving the generation, collection or processing of radioactive materials or other types of effluents. Therefore, no increase in the amounts of effluents or new types of effluents would be created.

(iii) there is no significant increase in individual or cumulative occupational radiation exposure

The requested license amendment involves no change to the facility and will not increase the radiation dose resulting from the operation of any plant system. Furthermore, implementation of this proposed change will not involve work activities that could contribute to occupational radiation exposure. Therefore, there will be no increase in individual or cumulative occupational radiation exposure associated with this proposed change.

Based on the above, it is concluded that there will be no impact on the environment resulting from this change. The change meets the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to specific environmental assessment by the Commission.

7.0 References

None

ATTACHMENT 2

TECHNICAL SPECIFICATION PAGE MARKUP

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 24 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

| <u>Valve Number</u> | <u>Valve Function</u> | <u>Valve Position</u> |
|---------------------|--|-----------------------|
| XSI0008 A, B, C | High Head Hot Leg Recirculation Isolation | Closed |
| XRH0019 A, B, C | Low Head Hot Leg Recirculation Isolation | Closed |

- b. At least once per 31 days by:
 - 1) Verifying that the ECCS piping is full of water by venting the ECCS pump casings and accessible discharge piping high points, and
 - 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:
 - 1) For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
 - 2) Of the areas affected within containment at the completion of each containment entry when CONTAINMENT INTEGRITY is established.
- d. At least once per 18 months by a visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components (~~trash racks, screens, etc.~~) show no evidence of structural distress or abnormal corrosion.