



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

May 18, 2010  
NOC-AE-10002541  
File No.: G25  
10 CFR 50.90

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
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South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Proposed Amendment to Technical Specification 6.8.3.1 for  
Containment Post-Tensioning System Surveillance Program

Pursuant to 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) requests Nuclear Regulatory Commission (NRC) approval of an amendment to Unit 1 Operating License NPF-76 and Unit 2 Operating License NPF-80. The proposed change affects Technical Specification 6.8.3.1, "Containment Post-Tensioning System Surveillance Program." A safety evaluation of the proposed change and the proposed revised pages of the Technical Specifications are attached.

Technical Specification 6.8.3.1 states that the Containment Post-Tensioning System Surveillance Program shall be in accordance with ASME Code Section XI, Subsection IWL, 1992 Edition with 1992 Addenda, as supplemented by 10 CFR 50.55a(b)(2)(viii). The current inspection interval for the South Texas Project ends September 2010. This proposed amendment provides for updating the surveillance program consistent with the updated edition of ASME Section XI as required by 10 CFR 50.55a.

STPNOC has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, STPNOC has determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment.

Approval of the proposed amendment is requested by September 30, 2010. The requested approval date will keep the STP Technical Specifications consistent with the applicable ASME Code edition for containment post-tensioning system surveillance. STPNOC will implement the amendment when the updated edition is applied following NRC approval.

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 attachment.

STI: 32641724

A047  
NRK

There are no commitments in this letter.

If there are any questions, please contact either Philip L. Walker at 361-972-8392 or me at 361-972-7566.

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

Executed on May 18, 2010  
Date



G. T. Powell  
Vice President, Engineering

PLW

Attachment: Evaluation Proposed Amendment to Technical Specification 6.8.3.1 for Containment Post-Tensioning System Surveillance Program

cc: (paper copy)

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# **ATTACHMENT**

## **SOUTH TEXAS PROJECT UNITS 1 AND 2**

### **Evaluation of the Proposed Change**

**Subject:** Proposed Amendment to Technical Specification 6.8.3.I for Containment Post-Tensioning System Surveillance Program

1.0 SUMMARY DESCRIPTION

2.0 PROPOSED CHANGE

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5.0 REGULATORY EVALUATION

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5.2 Applicable Regulatory Requirements

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## **SOUTH TEXAS PROJECT UNITS 1 AND 2**

### **Proposed Amendment to Technical Specification 6.8.3.I for Containment Post-Tensioning System Surveillance Program**

#### **1.0 SUMMARY DESCRIPTION**

South Texas Project (STP) Technical Specification Section 6.8.3.I states that the Containment Post-Tensioning System Surveillance Program shall be in accordance with ASME Code Section XI, Subsection IWL, 1992 Edition with 1992 Addenda, as supplemented by 10 CFR 50.55a(b)(2)(viii). The applicable ASME Code edition will change when the current 10-year inspection interval ends in September 2010. This change removes the specific year of the applicable Code edition to allow for future updates to the surveillance program without requiring additional Technical Specification changes.

#### **2.0 PROPOSED CHANGE**

STP Technical Specification 6.8.3.I currently states the following:

##### Containment Post-Tensioning System Surveillance Program

This program provides controls for monitoring any tendon degradation in prestressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measures prior to initial operations. The Containment Post-Tensioning System Surveillance Program shall be in accordance with ASME Code Section XI, Subsection IWL, 1992 Edition with 1992 Addenda, as supplemented by 10CFR50.55a(b)(2)(viii).

Changes proposed by this amendment will result in the following:

##### Containment Post-Tensioning System Surveillance Program

This program provides controls for monitoring any tendon degradation in prestressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measures prior to initial operations. The Containment Post-Tensioning System Surveillance Program shall be in accordance with ASME Code Section XI, Subsection IWL, ~~1992 Edition with 1992 Addenda, as supplemented by 10CFR50.55a(b)(2)(viii),~~ except where an alternative exemption, or relief has been authorized by the NRC.

#### **3.0 TECHNICAL EVALUATION**

There will be no change in the design basis of the South Texas Project as a result of this amendment. Compliance with the requirements of a given ASME code edition is determined by 10 CFR 50.55a. There will be no change in the level of compliance with the General Design Criteria. Consequently, removing the reference to a specific edition of the ASME code applied to the Containment Post-Tensioning System Surveillance

Program does not have a significant impact on safe operation of the South Texas Project.

#### **4.0 REGULATORY EVALUATION**

##### **4.1 Applicable Regulatory Requirements/Criteria**

10 CFR 50.55a currently requires that the containment structural integrity be determined in accordance with the requirements of ASME Code Section XI, Subsection IWL, "Requirements for Class CC Concrete Components of Light Water Cooled Power Plants," 1992 Edition including 1992 Addenda, as modified and supplemented by the requirements and limitations specified in 10 CFR 50.55a(b)(2)(viii), "Examination of Concrete Containments." ASME 2004 edition becomes applicable to STP in the next inspection interval.

This proposed amendment is consistent with NUREG-1431, "Standard Technical Specifications for Westinghouse Plants."

##### **4.1.1 General Design Criteria**

###### General Design Criterion 16, "Containment Design"

Reactor containment and associated systems shall be provided to establish an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment and to assure that the containment design conditions important to safety are not exceeded for as long as postulated accident conditions require.

This change does not affect the function of reactor containment and associated functions.

##### **4.1.2 Regulatory Compliance**

As a consequence of this change, STPNOC will be able to implement changes to the Containment Post-Tensioning System Surveillance Program for the 10-year inservice inspection interval updates consistent with the requirements of 10 CFR 50.55a(b)(2)(vi) and 10CFR50.55a(b)(2)(viii), which invoke the requirements of ASME Section XI, without requiring NRC approval of a supporting Technical Specification change. Future changes to the Containment Post-Tensioning System Surveillance Program that depart from code requirements will continue to require prior NRC approval, pursuant to the provisions of 10CFR50.55a. Therefore, adequate regulatory oversight will be maintained following implementation of this change without specifying the Code edition applicable to the inspection interval.

##### **4.2 Significant Hazards Consideration**

STPNOC has evaluated whether 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 Technical Specification change removes the specific edition of the ASME code to be applied. Inspection practices will continue to be consistent with the approved ASME code edition. The proposed change is consistent with NUREG-1481. Therefore, the proposed changes will not increase 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 changes will not alter the plant configuration (no new or different type of equipment will be installed) or require any unusual operator actions. The proposed changes will not alter the way any structure, system, or component functions, and will not significantly alter the manner in which the plant is operated. The response of the plant and the operators following an accident will not be different. In addition, the proposed change does not introduce any new failure modes. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously analyzed.

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

Response:

No. The proposed Technical Specification change removes the specific edition of the ASME code to be applied. Inspection practices will continue to be consistent with the approved ASME code edition. The change is consistent with NUREG-1481. Therefore, the proposed changes will not result in a reduction in a margin of safety.

Based on the above, STPNOC concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

#### 4.3 Conclusion

Based on the considerations discussed above: (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) implementation of the amendment will not be detrimental to the common defense and security or to the health and safety of the public.

## **5.0 ENVIRONMENTAL CONSIDERATION**

The proposed amendment will not change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, nor would change an inspection or surveillance requirement. The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement, or environmental assessment need be prepared in connection with the proposed amendment.

## **6.0 IMPLEMENTATION**

Approval of the proposed amendment is requested by September 30, 2010. The requested approval date will allow STPNOC to maintain consistency between the Technical Specifications and the ASME Section XI edition applicable in that inspection interval. STPNOC will revise the Technical Specifications when the updated Section XI edition is applied following NRC approval of this change.

**ENCLOSURE 1**

**UPDATED TECHNICAL SPECIFICATION PAGE 6-11**

6.8.3 (continued)

I. Containment Post-Tensioning System Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measures prior to initial operations. The Containment Post-Tensioning System Surveillance Program shall be in accordance with ASME Code Section XI, Subsection IWL, 1992 Edition with 1992 Addenda, as supplemented by 10CFR50.55a(b)(2)(viii), except where an alternative, exemption, or relief has been authorized by the NRC.

m. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
  1. A change in the TS incorporated in the license or
  2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 6.8.3.m.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

n. Offsite Dose Calculation Manual (ODCM)

- 1) The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

(continued)

**ENCLOSURE 2**

**PROPOSED TECHNICAL SPECIFICATION PAGE 6-11**

6.8.3 (continued)

I. Containment Post-Tensioning System Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measures prior to initial operations. The Containment Post-Tensioning System Surveillance Program shall be in accordance with ASME Code Section XI, Subsection IWL, as supplemented by 10CFR50.55a(b)(2)(viii) except where an alternative, exemption, or relief has been authorized by the NRC.

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(continued)