



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

April 24, 2019  
NOC-AE-19003617  
10 CFR 50.90

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
License Amendment Request to Revise Technical Specifications Tables for a  
Terminology Change to the P-13 Permissive Interlock Description

Pursuant to 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) hereby requests a license amendment to revise Technical Specification Tables 2.2-1, 3.3-1 and 4.3-1 to change the description of the P-13 permissive interlock for the Reactor Trip System (RTS) instrumentation. The phrases "Turbine Impulse Chamber Pressure" and "Turbine Impulse Pressure" would be replaced with "Turbine Inlet Pressure" throughout the Technical Specifications, resulting in a more generic P-13 description that does not specify a particular turbine blade design.

This change does not alter the current design or function of the P-13 permissive interlock and will have no effect on the operation of the RTS. This is an administrative change and no requirements are materially altered.

STPNOC is planning to modify the Unit 1 high pressure (HP) turbine to convert it to a fully reaction turbine. There is no modification currently planned for the Unit 2 HP turbine, but this more generic description for P-13 would be appropriate to describe the turbine design in both Units. The physical work, including procedure changes and component calibrations, will be performed under the STPNOC design change process and 10 CFR 50.59.

The Enclosure to this letter provides a description and assessment of the proposed changes including technical and regulatory evaluations and a No Significant Hazards Consideration analysis. Marked-up and re-typed (clean) Technical Specification pages are provided in Attachments 1 and 2, respectively.

This proposed change is similar to license amendments issued by the NRC to McGuire Nuclear Station on October 1, 2012 (ADAMS Accession No. ML12226A169), Beaver Valley Power Station on February 24, 2003 (ML030560174) and to Salem Nuclear Generating Station on October 1, 2003 (ML032370119).

STPNOC is requesting approval of this license amendment request by February 28, 2020 to support implementation of the modification during the next Unit 1 refueling outage. STPNOC will implement the amendment within 90 days of the NRC approval date.

STI: 34789287

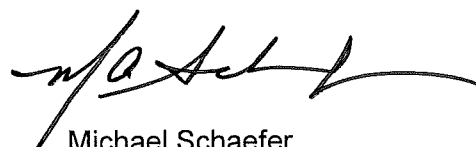
In accordance with 10 CFR 50.91(b), STPNOC is notifying the State of Texas of this license amendment request by transmitting a copy of this letter and Enclosure to the designated State Official. The proposed amendment has been reviewed and approved by the STPNOC Plant Operations Review Committee and has undergone an independent organizational unit review.

There are no regulatory commitments in this amendment request.

If there are any questions or if additional information is needed, please contact Wendy Brost at (361) 972-8516 or me at (361) 972-7888.

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

Executed on 4/24/2019



Michael Schaefer  
Site Vice President

web

Enclosure: Evaluation of the Proposed Change

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## ENCLOSURE

### Evaluation of the Proposed Change

Subject: License Amendment Request to Revise Technical Specifications Tables for a Terminology Change to the P-13 Permissive Interlock Description

1. SUMMARY DESCRIPTION
2. DETAILED DESCRIPTION
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## 1. SUMMARY DESCRIPTION

The proposed amendment would revise Technical Specification Tables 2.2-1, 3.3-1 and 4.3-1 to change the description of the P-13 permissive interlock for the Reactor Trip System (RTS) instrumentation. The phrases "Turbine Impulse Chamber Pressure" and "Turbine Impulse Pressure" would be replaced with the phrase "Turbine Inlet Pressure" throughout the Technical Specifications, resulting in a more generic P-13 description that does not specify a particular turbine design. This license amendment request is administrative in nature and does not alter the current design or function of the P-13 permissive.

## 2. DETAILED DESCRIPTION

### 2.1. System Design and Operation

The STP Unit 1 and Unit 2 HP turbines are currently equipped with a combination of impulse and reaction blading with impulse blading in the first row. STPNOC is planning a modification to the Unit 1 HP turbine that would eliminate the impulse row, converting it to a fully reaction turbine.

The P-13 permissive generates an interlock at a prescribed turbine pressure setpoint that is equivalent to a specified plant power level. In the current Technical Specification Bases, the only listed function of the P-13 permissive interlock is to provide an input to the P-7 permissive interlock. The P-13 signal is one of two inputs to the Low Power Reactor Trips Block, P-7. On increasing power, P-7 automatically enables reactor trips on low flow in more than one reactor coolant loop, reactor coolant pump bus undervoltage and under frequency, pressurizer low pressure, and pressurizer high level. On decreasing power, the above listed trips are automatically blocked (Reference 6.7).

Following the planned Unit 1 HP turbine modification, these permissives will operate in the same manner and there will be no impact to the operation of the RTS.

### 2.2. Current Technical Specification Requirements

In both Table 3.3-1 and Table 4.3-1 of the STP Technical Specifications, the P-13 interlock is listed in Functional Unit 19.f. as "Turbine Impulse Chamber Pressure". This proposed amendment would change this description to "Turbine Inlet Pressure".

Additionally, Technical Specification Table 2.2-1 defines the "Trip Setpoint" and "Allowable Value" for the P-13 permissive as:

Trip Setpoint:  $\leq 10\%$  Rated Thermal Power (RTP) Turbine Impulse Pressure Equivalent

Allowable Value:  $\leq 11.7\%$  RTP Turbine Impulse Pressure Equivalent

This proposed amendment would change "Turbine Impulse Pressure Equivalent" to "Turbine Inlet Pressure Equivalent" in this Table.

### **2.3. Reason for the Proposed Change**

The term "impulse" in "Turbine Impulse Chamber Pressure" and "Turbine Impulse Pressure" refers to a particular type of turbine blade design. STP plans to modify the Unit 1 HP turbine to a fully reaction turbine by installing reaction turbine blades in all stages, so a terminology change is needed.

The proposed Technical Specification change would result in a more generic P-13 description that does not specify a particular turbine blade design. This would allow the same description to apply to both the Unit 1 and Unit 2 HP turbines following the planned modification for Unit 1, eliminating potential confusion. Further, using this more generic terminology would allow flexibility for future turbine design enhancements without necessarily requiring an additional license amendment.

### **2.4. Description of the Proposed Changes**

The proposed change would replace the phrase "Turbine Impulse Chamber Pressure" or "Turbine Impulse Pressure", as appropriate, with the phrase "Turbine Inlet Pressure" in the descriptive text associated with the P-13 interlock for the Reactor Trip System (RTS). This will be a global change throughout the Technical Specifications and Technical Specification Bases. This terminology change is administrative in nature and does not involve any physical or design change for the P-13 function and will have no effect on the operation of the RTS.

The proposed Technical Specification changes are shown in the marked-up Technical Specification pages provided in Attachment 1.

## **3. TECHNICAL EVALUATION**

The proposed terminology change for the P-13 permissive has no impact upon plant operation or safety. No safety-related equipment, safety function, or plant operations will be altered as a result of this proposed change. This proposed terminology change is administrative in nature and does not alter the design or function of the P-13 permissive.

The physical work, including procedure changes and component calibrations, for the planned Unit 1 HP turbine modification will be performed under the STPNOC design change process and 10 CFR 50.59.

## **4. REGULATORY EVALUATION**

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

The following NRC requirements and guidance documents are applicable to the proposed change.

#### ***General Design Criterion (GDC) 13, "Instrumentation and control"***

GDC 13 states that "[i]nstrumentation shall be provided to monitor variables and systems over their anticipated ranges for normal operation, for anticipated operational occurrences, and for accident conditions as appropriate to ensure adequate safety... Appropriate controls shall be provided to maintain these variables and systems within prescribed operating ranges."

The proposed change is administrative in nature and will not alter the current design or function of the P-13 permissive. This proposed change will have no effect on the operation of the RTS instrumentation. Therefore, the proposed change will not affect compliance with GDC 13.

#### **10 CFR 50.36, "Technical Specifications"**

10 CFR 50.36 establishes the requirements related to the content of the Technical Specifications for operating power plants: (1) Safety limits, limiting safety system settings, and limiting control settings, (2) Limiting conditions for operation, (3) Surveillance requirements, (4) Design features, (5) Administrative controls, (6) Decommissioning and (7) Initial notification, and (8) Written Reports. Specifically, for Surveillance Requirements 10 CFR 50.36 states:

10 CFR Part 50.36(c)(3) "*Surveillance requirements*". Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

The proposed changes to the Technical Specifications do not affect conformance with 10 CFR 50.36 requirements as the change is administrative in nature. Therefore, the proposed change is in conformance with 10 CFR 50.36.

#### **Technical Specification 2.2.1, Reactor Trip System Instrumentation Setpoints**

The proposed change does not eliminate or alter the limits or required actions described in this Technical Specification, it merely changes the descriptive text associated with the P-13 permissive interlock.

#### **Technical Specification 3/4.3.1, Reactor Trip System Instrumentation**

The proposed change does not eliminate or alter the limits or required actions described in this Technical Specification, it merely changes the descriptive text associated with the P-13 permissive interlock.

### **4.2. Precedent**

The NRC has previously approved similar license amendment requests submitted by McGuire Nuclear Station on December 5, 2011 (Reference 6.2), Beaver Valley Power Station on August 7, 2002 (Reference 6.3) and Salem Nuclear Generating Station on April 10, 2003 (Reference 6.4). The NRC approved the McGuire amendment request on October 1, 2012 (Reference 6.1), the Beaver Valley amendment request on February 24, 2003 (Reference 6.5) and the Salem amendment request on October 1, 2003 (Reference 6.6).

Similar to these previously-approved amendments, this proposed license amendment constitutes a minor clarifying change to the descriptive text for a RTS instrumentation permissive in support of a modification that converts a turbine to a fully reactive design. As in these approved amendments, this request does not alter the current design or function of the permissive and will have no effect on the operation of the RTS. This is an administrative change and no requirements are materially altered.

### **4.3. No Significant Hazards Consideration Determination Analysis**

STP Nuclear Operating Company (STPNOC) requests approval of a change to the STP Unit 1 and Unit 2 Technical Specifications. The proposed change would replace the phrases "Turbine Impulse Chamber Pressure" and "Turbine Impulse Pressure" with "Turbine Inlet Pressure" in the descriptive text associated with the P-13 function of the Reactor Trip System (RTS).

STPNOC has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change to replace the words "Turbine Impulse Chamber Pressure" or "Turbine Impulse Pressure", as appropriate, with "Turbine Inlet Pressure" in the descriptive text associated with the P-13 function of the Reactor Trip System does not involve any physical or design change to the P-13 function. The proposed change is intended to eliminate potential confusion by making the description generically applicable for other turbine types.

Therefore, there is no impact to the probability or consequences of an accident previously evaluated due to the proposed change.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

Replacing the words "Turbine Impulse Chamber Pressure" with "Turbine Inlet Pressure" in the descriptive text associated with the P-13 function will not create the possibility of a new or different kind of accident from any accident previously evaluated. No safety-related equipment, safety function, or plant operation will be altered as a result of this proposed change. No new operator actions are created as a result of the proposed change.

Changing the descriptive text associated with the P-13 permissive has no impact on the accidents analyzed in the STPNOC Updated Final Safety Analysis Report (UFSAR) and is not an accident initiator. Since this change does not impact any conditions that would initiate an accident, there is no possibility of a new or different kind of accident resulting from this change.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Changing the descriptive text associated with the P-13 permissive will not affect the margin of safety. The margin of safety presently provided by the Technical Specifications remains unchanged.

The proposed amendment does not affect the design of the facility or system operating parameters, does not physically alter safety-related systems and does not affect the method in which safety-related systems perform their functions.

Therefore, the proposed change does not impact 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.



#### **4.4. Conclusions**

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) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### **5. ENVIRONMENTAL CONSIDERATION**

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a 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. REFERENCES

- 6.1. Letter from J. Thompson, NRC, to S.D. Capps, Duke Energy Carolinas, LLC, "McGuire Nuclear Station, Units 1 and 2, Issuance of Amendments Regarding Changes to Technical Specification 3.3.1, 'Reactor Trip System (RTS) Instrumentation,' (TAC Nos. ME7873 and ME7874)," October 1, 2012 (ML12226A169)
- 6.2. Letter from R.T. Repko, Duke Energy Carolinas, LLC, to NRC Document Control Desk, "Duke Energy Carolinas, LLC (Duke Energy) McGuire Nuclear Station, Units 1 and 2 Docket Numbers 50-369 and 50-370 License Amendment Request for Changes to Technical Specification Table 3.3.1-1, Reactor Trip System Instrumentation, Function 16(e)," December 5, 2011 (ML11341A110)
- 6.3. Letter from M.B. Bezilla, FirstEnergy Nuclear Operating Company, to NRC Document Control Desk, "Beaver Valley Power Station, Unit No. 1 and No. 2 Docket No. 50-334, License No. DPR-66 Docket No. 50-412, License No. NPF-73 License Amendment Request Nos. 307 and 178," August 7, 2002 (ML022240317)
- 6.4. Letter from D.F. Garchow, PSEC Nuclear LLC, to NRC Document Control Desk, "Request for Changes to Technical Specifications Table 3.3-1, Reactor Trip System Instrumentation Salem Nuclear Generating Station, Units 1 and 2 Facility Operating Licenses DPR-70 and DPR-75 Docket Nos. 50-272 and 50-311," April 10, 2003 (ML031070491)
- 6.5. Letter from T.G. Colburn, NRC, to M.B. Bezilla, FirstEnergy Nuclear Operating Company, "Beaver Valley Power Station, Unit Nos. 1 and 2 – Issuance of Amendments RE: Containment Spray Nozzle Surveillance Requirements (TAC Nos. MB5850 and MB5851)," February 24, 2003 (ML030560174)
- 6.6. Letter from R.J. Fretz, NRC, to R.A. Anderson, PSEG Nuclear LLC, "Salem Nuclear Generating Station, Unit Nos. 1 and 2, Issuance of Amendments Re: Table 3.3-1, Reactor Trip System Instrumentation (TAC Nos. MB8445 and MB8446)," October 1, 2003 (ML032370119)
- 6.7. Technical Specification Bases 2.2.1, *Reactor Trip System Instrumentation Setpoints – Reactor Trip System Interlocks*
- 6.8. Technical Specification 3/4.3.1, *Reactor Trip System Instrumentation*
- 6.9. STP Nuclear Operating Company Updated Final Safety Analysis Report, Rev. 19, Chapter 7, *Instrumentation and Controls*
- 6.10. USFAR Section 2.2.1.1, Reactor Control System

Enclosure  
NOC-AE-19003617  
Attachment 1

**Attachment 1**  
**Technical Specification Page Markups**

TABLE 2.2-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
18. Reactor Trip System Interlocks		
a. Intermediate Range Neutron Flux, P-6	$\geq 1 \times 10^{-10}$ amp	$\geq 6 \times 10^{-11}$ amp
b. Low Power Reactor Trips Block, P-7		
1) P-10 input	$\leq 10\%$ of RTP**	$\leq 11.7\%$ of RTP**
2) P-13 input	$\leq 10\%$ RTP** Turbine <b>Inlet</b> Impulse Pressure Equivalent	$\leq 11.7\%$ RTP** Turbine <b>Inlet</b> Impulse Pressure Equivalent
c. Power Range Neutron Flux, P-8	$\leq 40\%$ of RTP**	$\leq 41.7\%$ of RTP**
d. Power Range Neutron Flux, P-9	$\leq 50\%$ of RTP**	$\leq 51.7\%$ of RTP**
e. Power Range Neutron Flux, P-10	$\geq 10\%$ of RTP**	$\geq 8.3\%$ of RTP**
f. Turbine <b>Inlet</b> Impulse Chamber Pressure, P-13	$\leq 10\%$ RTP** Turbine <b>Inlet</b> Impulse Pressure Equivalent	$\leq 11.7\%$ RTP** Turbine <b>Inlet</b> Impulse Pressure Equivalent
19. Reactor Trip Breakers	N.A.	N.A.
20. Automatic Trip and Interlock Logic	N.A.	N.A.

\*\*RTP = RATED THERMAL POWER

TABLE 3.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
18. Safety Injection Input from ESFAS	2	1	2	1, 2	9A
19. Reactor Trip System Interlocks					
a. Intermediate Range Neutron Flux, P-6	2	1	2	2##	8
b. Low Power Reactor Trips Block, P-7					
P-10 Input	4	2	3	1	8
or					
P-13 Input	2	1	2	1	8
c. Power Range Neutron Flux, P-8	4	2	3	1	8
d. Power Range Neutron Flux, P-9	4	2	3	1	8
e. Power Range Neutron Flux, P-10	4	2	3	1, 2	8
f. Turbine Inlet Chamber Pressure, P-13	2	1	2	1	8
20. Reactor Trip Breakers	2	1	2	1, 2	9, 12
	2	1	2	3*, 4*, 5*	10, 12A

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK (20)	CHANNEL CALIBRATION(20)	ANALOG CHANNEL OPERATIONAL TEST (19)(20)	TRIP ACTUATING DEVICE OPERATIONAL TEST(20)	ACTUATION LOGIC TEST(20)	MODES FOR WHICH SURVEILLANCE IS REQUIRED
19. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	N.A.	(4)		N.A.	N.A.	2**
b. Low Power Reactor Trips Block, P-7	N.A.	(4)		N.A.	N.A.	1
c. Power Range Neutron Flux, P-8	N.A.	(4)		N.A.	N.A.	1
d. Power Range Neutron Flux, P-9	N.A.	(4)		N.A.	N.A.	1
e. Power Range Neutron Flux, P-10	N.A.	(4)		N.A.	N.A.	1, 2
f. Turbine Impulse Chamber Pressure, P-8	N.A.			N.A.	N.A.	1
20. Reactor Trip Breaker	N.A.	N.A.	N.A.	(7, 11)	N.A.	1, 2, 3*, 4*, 5*
21. Automatic Trip and Interlock Logic	N.A.	N.A.	N.A.	N.A.	(7)	1, 2, 3*, 4*, 5*
22. Reactor Trip Bypass Breaker	N.A.	N.A.	N.A.	(15), R(16)	N.A.	1, 2, 3*, 4*, 5*

SOUTH TEXAS - UNITS 1 & 2

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Unit 1 - Amendment No. 59, 136 188  
Unit 2 - Amendment No. 47, 125 175

Enclosure  
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Attachment 2

**Attachment 2**  
**Retyped Technical Specification Pages**

TABLE 2.2-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
18. Reactor Trip System Interlocks		
a. Intermediate Range Neutron Flux, P-6	$\geq 1 \times 10^{-10}$ amp	$\geq 6 \times 10^{-11}$ amp
b. Low Power Reactor Trips Block, P-7		
1) P-10 input	$\leq 10\%$ of RTP**	$\leq 11.7\%$ of RTP**
2) P-13 input	$\leq 10\%$ RTP** Turbine Inlet Pressure Equivalent	$\leq 11.7\%$ RTP** Turbine Inlet Pressure Equivalent
c. Power Range Neutron Flux, P-8	$\leq 40\%$ of RTP**	$\leq 41.7\%$ of RTP**
d. Power Range Neutron Flux, P-9	$\leq 50\%$ of RTP**	$\leq 51.7\%$ of RTP**
e. Power Range Neutron Flux, P-10	$\geq 10\%$ of RTP**	$\geq 8.3\%$ of RTP**
f. Turbine Inlet Pressure, P-13	$\leq 10\%$ RTP** Turbine Inlet Pressure Equivalent	$\leq 11.7\%$ RTP** Turbine Inlet Pressure Equivalent
19. Reactor Trip Breakers	N.A.	N.A.
20. Automatic Trip and Interlock Logic	N.A.	N.A.

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 \*\*RTP = RATED THERMAL POWER



TABLE 3.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
18. Safety Injection Input from ESFAS	2	1	2	1, 2	9A
19. Reactor Trip System Interlocks					
a. Intermediate Range Neutron Flux, P-6	2	1	2	2##	8
b. Low Power Reactor Trips Block, P-7					
P-10 Input	4	2	3	1	8
or					
P-13 Input	2	1	2	1	8
c. Power Range Neutron Flux, P-8	4	2	3	1	8
d. Power Range Neutron Flux, P-9	4	2	3	1	8
e. Power Range Neutron Flux, P-10	4	2	3	1, 2	8
f. Turbine Inlet Pressure, P-13	2	1	2	1	8
20. Reactor Trip Breakers	2	1	2	1, 2	9, 12
	2	1	2	3*, 4*, 5*	10, 12A

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK (20)</u>	<u>CHANNEL CALIBRATION(20)</u>	<u>ANALOG CHANNEL OPERATIONAL TEST (19)(20)</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST(20)</u>	<u>ACTUATION LOGIC TEST(20)</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
19. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	N.A.	(4)		N.A.	N.A.	2**
b. Low Power Reactor Trips Block, P-7	N.A.	(4)		N.A.	N.A.	1
c. Power Range Neutron Flux, P-8	N.A.	(4)		N.A.	N.A.	1
d. Power Range Neutron Flux, P-9	N.A.	(4)		N.A.	N.A.	1
e. Power Range Neutron Flux, P-10	N.A.	(4)		N.A.	N.A.	1, 2
f. Turbine Inlet Pressure, P-13	N.A.			N.A.	N.A.	1
20. Reactor Trip Breaker	N.A.	N.A.	N.A.	(7, 11)	N.A.	1, 2, 3*, 4*, 5*
21. Automatic Trip and Interlock Logic	N.A.	N.A.	N.A.	N.A.	(7)	1, 2, 3*, 4*, 5*
22. Reactor Trip Bypass Breaker	N.A.	N.A.	N.A.	(15), R(16)	N.A.	1, 2, 3*, 4*, 5*

SOUTH TEXAS - UNITS 1 & 2

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Unit 1 - Amendment No. 59, 136 188  
Unit 2 - Amendment No. 47, 125 175