

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

March 7, 1990
ST-HL-AE-3394
File No.: G9.06, G20.01
10CFR50.90
10CFR50.92
10CFR51

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

South Texas Project Electric Generating Station
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Proposed Amendment to the Unit 1 and Unit 2
Technical Specification 3.3.3.6 for Pressurizer Level

Pursuant to 10CFR50.90, Houston Lighting & Power Company (HL&P) hereby proposes to amend its Operating Licenses NPF-76 and NPF-80 by incorporating the attached proposed change to the Technical Specifications for the South Texas Project Electric Generating Station (STPEGS) Units 1 and 2.

The proposed change consists of eliminating the requirement to shutdown if one of four pressurizer level post-accident monitoring channels is inoperable. The proposed change will maintain a conservative design and reduce the potential for unnecessary unplanned shutdowns, thereby increasing plant safety and reliability.

HL&P has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. The basis for this determination is provided in the attachments. In addition, based on the information contained in this submittal and in the NRC Final Environmental Statement related to the operation of STPEGS Units 1 and 2, HL&P has concluded that, pursuant to 10CFR51, there are no significant radiological or non-radiological impacts associated with the proposed action and the proposed license amendment will not have a significant effect on the quality of the environment.

STPEGS Unit 2 has been operating under the conditions of Specification 3.3.3.6 ACTION 38a since January 16, 1990; therefore expeditious processing of this proposed change is requested in order to prevent a potential unscheduled shutdown initiation on April 16, 1990.

The STPEGS Nuclear Safety Review Board has reviewed and approved the proposed changes.

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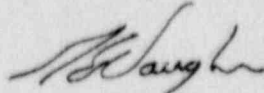
A Subsidiary of Houston Industries Incorporated

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In accordance with 10CFR50.91(b), HL&P is providing the State of Texas with a copy of this proposed amendment.

If you should have any questions concerning this matter, please contact Mr. A. W. Harrison at (512) 972-7298 or myself at (512) 972-7921.



G. E. Vaughn
Vice President
Nuclear Operations

AWli/hg

- Attachment: 1. Significant Hazards Evaluation for
Eliminating from Technical Specification
3.3.3.6 the Shutdown Requirement for Loss
of One of Four Channels of Pressurizer
Level instrumentation
2. Proposed Technical Specification Change
3.3.3.6, Table 3.3-10.

cc:

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Revised 12/15/89

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

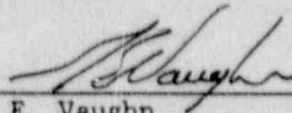
South Texas Project
Units 1 and 2

vs
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Docket Nos. 50-498
50-499

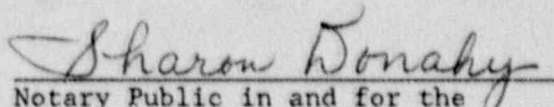
AFFIDAVIT

G. E. Vaughn, being duly sworn, hereby deposes and says that he is Vice President, Nuclear Operations, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed change to the South Texas Project Electric Generating Station Technical Specification 3.3.3.6 is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.



G. E. Vaughn
Vice President, Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State of Texas this *7th* day of *March*, 1990.



Notary Public in and for the
State of Texas

Attachment 1

Significant Hazards Evaluation for Eliminating from the
Technical Specification 3.3.3.6 the Shutdown Requirement for
Loss of One of Four Channels of Pressurizer Level InstrumentationBackground

The Post-Accident Monitoring (PAMS) instrumentation involved in the proposed change is pressurizer water level. These are Regulatory Guide 1.97 Rev. 2 category 1 instruments, as shown in STPEGS UPSAR Table 7.5-1. For this parameter there are four safety grade channels that input into the Qualified Display Processing System (QDPS). The QDPS post-accident monitoring function for the subject parameter will remain operable as long as there is at least one valid input. This provides STPEGS a degree of redundancy and conservatism when compared to the requirements of Westinghouse Standard Technical Specifications.

Requiring plant shutdown in the ACTION statement with the loss of only one channel is overly restrictive to plant operation and unnecessarily creates the potential for unplanned plant shutdowns. HL&P believes that eliminating this requirement will result in more reliable and safer operations.

Proposed Change

HL&P proposes to revise Table 3.3-10 of Technical Specification 3.3.3.6 to eliminate the shutdown requirement of ACTION 38 for loss of one of four channels of pressurizer level instrumentation.

Safety Evaluation

The STPEGS Technical Specifications presently require the plant to be shutdown if one channel is inoperable and cannot be restored in 90 days. If the cause of inoperability is associated with the channel's tubing and valves, restoring operability at power may not be practical or possible because the high temperatures and pressures involved can be a threat to repair personnel. HL&P believes that imposing a plant shutdown because of the unavailability of one of four channels of post-accident monitoring instrumentation is unjustified in view of the degree of redundancy and the undesirability of performing an unplanned shutdown with its attendant cycles on plant equipment. The Standard Technical Specifications for Westinghouse Pressurized Water Reactors, NUREG-0452, Revision 5 require a total of two channels for the Pressurizer Water Level PAMS. The minimum channels operable requirement is one and with one channel operable the allowed outage time (AOT) is 7 days. With both channels inoperable, the AOT is 48 hours.

The proposed Technical Specification change provides a 31 day AOT with only two channels operable which is conservative when compared to the Standard Technical Specifications and reflects the design of STPEGS. The proposed 7 day AOT for only one channel operable and 48 hours for no channels operable follows the Standard Technical Specifications. Note that there are no changes to the existing STPEGS ACTIONS for more than one channel inoperable. Additionally, the proposed change will not require a plant shutdown with one channel inoperable which will have a positive effect on plant reliability and reduces potential challenges to safety systems.

The proposed change to allow a new action statement (ACTION 43) involves no physical changes to the station. The plant design and instrumentation configuration and quality classification are unchanged. The proposed change does not in any way affect the requirements of Technical Specification 3.3.1 governing the Reactor Trip function associated with this instrumentation.

Based on the evaluation above, HL&P concludes that the change in no way degrades the reliability or design of the post-accident monitoring instrumentation and further reduces the potential for unplanned plant shutdowns and is consequently an overall improvement in station safety and reliability.

Determination of Significant Hazards

Pursuant to 10CFR50.91, this analysis provides a determination that the proposed change to the Technical Specifications does not involve any significant hazards consideration as defined in 10CFR50.92.

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Eliminating the shutdown requirement in the ACTION statement for loss of one of four channels of post-accident monitoring instrumentation has no bearing on the probability of an accident because monitoring instrumentation does not contribute to accident probability. The accident mitigation function of the subject instrumentation is addressed by other Technical Specifications, which are unaffected by this proposed change. Additionally, three channels of Pressurizer Level can monitor the pressurizer level in a post-accident mode and provides one more channel than required in the Standard Technical Specifications. Consequently, the consequences of an accident are not affected by the proposed change.

- 2) The proposed change does not create the possibility of a new or different kind of accident from that previously evaluated. The proposed change involves no changes to the station or its design bases nor does it impose any new accident scenarios.
- 3) The proposed change does not involve a significant reduction in a margin of safety. There is no change to the margin of safety since there is no change to the station or its design bases.

Conclusion

Based on the above, HL&P concludes that the proposed change satisfies the significant hazards considerations standards of 10CFR50.92(c) and a no significant hazards consideration finding is justified.