

# The Light company

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

March 14, 1994  
ST-HL-AE-4708  
File No.: G09.06  
10CFR50.90,  
10CFR50.92, 10CFR51

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498; STN 50-499  
Revise Technical Specification Section 3/4.0

Houston Lighting & Power Company (HL&P) proposes to amend Facility Operating Licenses NPF-76 and NPF-80 for South Texas Project Units 1 and 2 by incorporating the attached proposed amendment to Technical Specification Section 3/4.0, Applicability. The amendment will add a new Limiting Condition For Operations, LCO 3.0.6, to the section. LCO 3.0.6 will allow equipment removed from service or declared inoperable to comply with actions to be returned to service, under administrative controls, solely to perform testing required to demonstrate its operability or the operability of other equipment. We request an expeditious review to support scheduled April activities for Unit 2 restart.

HL&P has reviewed the proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, HL&P has determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment. The STPEGS Nuclear Safety Review Board has reviewed and approved the proposed change.

The required affidavit, along with a Safety Evaluation and No Significant Hazards Consideration Determination associated with the proposed change, and markedup effected pages of the Technical Specifications are included as attachments to the letter.

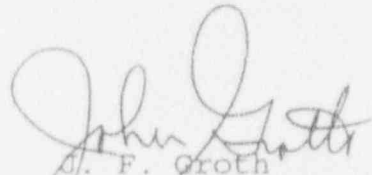
In accordance with 10CFR50.91(b), HL&P is providing the State of Texas with a copy of this proposed amendment.

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Project Manager on Behalf of the Participants in the South Texas Project

ADD 1

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.

  
J. F. Groth  
Vice President,  
Nuclear Generation

JFG/eg

- Attachment:
1. Affidavit
  2. Safety Evaluation and No Significant Hazards Consideration Determination
  3. Proposed Technical Specification Changes for Limiting Condition for Operation 3.0.6.

C:

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U. S. Nuclear Regulatory Comm.  
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ATTACHMENT 1

AFFIDAVIT

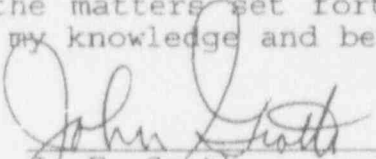
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter                    )  
  )  
Houston Lighting & Power        )  
  Company, et al.,                )  
  )  
South Texas Project             )  
Units 1 and 2                    )  
  )

Docket Nos. 50-498  
  50-499

AFFIDAVIT

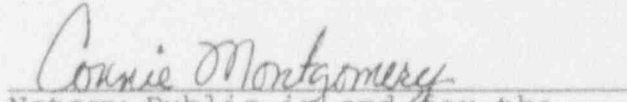
I, J. F. Groth, being duly sworn, hereby depose and say that I am Vice President, Nuclear Generation, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached Proposed Amendment to the Technical Specification Section 3/4.0; that I am familiar with the content thereof; and that the matters set forth therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
J. F. Groth  
Vice President,  
Nuclear Generation

STATE OF TEXAS                )  
  )  
  )

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 14 day of March, 1994.



  
\_\_\_\_\_  
Notary Public in and for the  
State of Texas

ATTACHMENT 2  
SAFETY EVALUATION  
AND  
NO SIGNIFICANT HAZARDS  
CONSIDERATION DETERMINATION

### Background

In September 1992, the U.S. Nuclear Regulatory Commission issued NUREG-1431, Standard Technical Specifications, Westinghouse Plants. One of the issues addressed by this NUREG was returning equipment to service for testing that had been declared inoperable or removed from service to comply with technical specification action statements. The problem involved the need to perform operability testing that would require returning equipment to service in conflict with a technical specification action statement. This problem was solved in the NUREG by the Limiting Condition For Operation (LCO) that provided an exception to the requirements of LCO 3.0.2 for systems returned to service during the performance of testing. This amendment will incorporate this Limiting Condition For Operation.

### Description of Proposed Changes

The proposed change to the South Texas Project Electric Generating Station Technical Specifications will involve the addition of a new Limiting Condition For Operation (LCO) to Technical Specification section 3/4.0, "Applicability". The new Limiting Condition For Operations, LCO 3.0.6, will permit non compliance with the applicable Action statement(s) to perform the post maintenance and surveillance testing required to demonstrate the operability of the equipment being returned to service or the operability of other equipment. LCO 3.0.6 will in effect provide an exception to the requirements of LCO 3.0.2 for systems returned to service under administrative control during the time required to perform the necessary testing.

### Safety Evaluation

The proposed amendment to the South Texas Project (STP) Technical Specifications (TS) involves the addition of a new Limiting Condition For Operation (LCO), 3.0.6, to section 3/4.0 "Applicability". LCO 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with action statements. The purpose of this new LCO is to provide an exception to the requirements of LCO 3.0.2. This new LCO will permit non compliance with the applicable Required Action(s) to perform the post maintenance and surveillance testing required to demonstrate the operability of the equipment being returned to service or the operability of other equipment. Without the exception provided by the new LCO 3.0.6 to the requirements of LCO 3.0.2 it would be necessary in some instances to obtain an enforcement discretion or change modes to verify operability of the equipment being returned to service. This testing will be performed under the

administrative control of Operations. These administrative controls will include a procedure that provides the Shift Supervisor with guidance on compensatory actions, logging the time the equipment is returned to service in conflict with the action statement and logging the time the equipment is declared operable or removed from service again. The testing will be performed after all necessary maintenance has been completed and there is a high confidence level that the component will perform as designed. The administrative controls will also ensure the time the equipment is in conflict with the requirements of the action statements is limited to the time absolutely necessary to perform the required testing.

An example of demonstrating the operability of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform post maintenance testing and the Surveillance Requirements.

An example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of the Surveillance Requirements on another channel in the trip system. A similar example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of post maintenance testing or a Surveillance Requirement on another channel in the same trip system.

#### No Significant Hazards Consideration Determination

Houston Lighting & Power (HL&P) has evaluated the proposed amendment against the criteria of 10CFR50.92 as follows:

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

The implementation of Limiting Condition For Operation (LCO) 3.0.6 from NUREG 1431 will allow the orderly and judicious return to service of inoperable equipment. This LCO will permit equipment removed from service to comply with Required Actions to be returned to service under administrative controls to verify the component or system will perform its safety function. The administrative controls will ensure the time involved will be limited to only the time required to demonstrate the component or system's operability. The implementation of this new LCO



will provide an acceptable method of testing technical specification equipment prior to its return to operable service following required maintenance. These actions will ensure that the equipment being returned to service is capable of performing it's designed safety function prior to being declared operable. Therefore, this action will ensure the probability or consequences of an accident previously evaluated is not significantly increased.

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

The administrative controls will ensure the time involved will be limited to only the time required to demonstrate the component or system's operability. In addition the equipment is only being tested in its designed configuration or being returned to service to allow testing of another component or system. Therefore, the use of this new Limiting Condition For Operation will not result in a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in a margin to safety?

The use of the new Limiting Condition For Operation (LCO) will only allow the return to service of equipment that is expected to operate as designed. The use of the LCO will be limited to the performance of testing on the equipment being returned to service or on other equipment that is dependent on the equipment being returned to service. This testing is limited to post maintenance testing and the testing necessary to prove operability. Since the equipment will be controlled by administrative requirements that will ensure all necessary actions are taken, this change doesn't involve a significant reduction in a margin to safety.

#### Implementation Plan

Houston Lighting & Power requests an implementation time of 31 days from the effective date to complete procedures and make appropriate document distribution.