



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 29, 1990

Docket No. 50-499

Mr. Donald P. Hall
Group Vice-President, Nuclear
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77251

Dear Mr. Hall:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATION 4.4.6.2.2d
CONCERNING THE TIME ALLOWED FOR THE ESTABLISHMENT OF OPERABILITY OF
REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES, SOUTH TEXAS PROJECT,
UNIT 2 (TAC NO. 79079)

By letter dated November 19, 1990, Houston Lighting & Power Company (HL&P) requested a waiver of compliance of the requirements of Technical Specification (TS) Surveillance 4.4.6.2.2d. The proposed change was to extend the time required to establish operability of the pressure isolation valves (PIVs) from 24 hours to 72 hours.

In a related November 15, 1990 letter, HL&P stated that one of the items required prior to restart from a refueling outage is that RTD cross calibrations be done. Performance of the resistance temperature detector (RTD) cross calibrations is done at various temperature plateaus, with a total estimated time for completion of 38 hours from Mode 4 entry until normal operating pressure and temperature (NOP/NOT) are reached. Concurrently, TS 4.4.6.2.2d requires that a leak check of PIVs be performed within 24 hours following flow through or actuation of the valve. Three of the PIVs require NOP/NOT to perform the required leak test to avoid injection of water into the reactor vessel. In order to comply with both TS requirements, plant heatup would have to be done within 24 hours in order to perform the PIV surveillances and then cooled down to Mode 4 to begin the RTD cross calibrations.

The NRC staff has reviewed the proposed waiver of compliance and held several telephone conversations involving HL&P, NRR, and Region IV staffs. In considering the request, the staff noted that the plant residual heat removal (RHR) system is comprised of three independent trains of RHR, with each train having two isolation valves in series forming the high/low pressure boundary between the reactor coolant system and the RHR/LPSI systems. During pressurization of the primary system, any gross leakage through the first two valves would be indicated by increases in tank levels which are monitored during the pressurization. The aforementioned contributes to the staff's conclusion that the added risk of overpressurization of the low pressure system during the additional time period is low. Further, it was noted that extension of the surveillance interval would obviate the need to impose an additional pressure cycle on the equipment. Finally, the RHR system at South Texas is entirely within the containment so leakage, if any, would not present a hazard to the public.

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This letter provides written approval of the requested waiver of compliance, which will remain in effect only during the restart of Unit 2 from the current refueling outage (2RE01). As requested by HL&P in the November 19, 1990 letter the staff will review the proposed changes to Section 4.4.6.2.2 of the TS included in the request for license amendment dated November 15, 1990 (ST-HL-AE-3627). We will proceed with an expeditious review of the proposed changes in accordance with the procedures for review of proposed license amendments.

Sincerely,

(ORIGINAL SIGNED BY)

Martin J. Virgilio, Assistant Director
for Regions IV and V Reactors
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

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| | | | | | |
|------|-------------|-------------|--------------|-------------|--------------------------------|
| OFC | : PDIV-2/LA | : PDIV-2/PM | : PDIV-2(A)D | : NRR:SRXB | : D:DRP:RIV |
| NAME | : EPeyton | : GDick:ye | : EImbro | : RJones | : SCollins <i>with release</i> |
| DATE | : 11/21/90* | : 11/21/90* | : 11/21/90* | : 11/21/90* | : 11/28/90 |

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|------|-----------------------|---|---|---|---|
| OFC | : ADR4/5:DRP345 | : | : | : | : |
| NAME | : MVirgilio <i>MV</i> | : | : | : | : |
| DATE | : 11/28/90 | : | : | : | : |

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