

# The Light company

Houston Lighting & Power

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January 08, 1991  
ST-HL-AE-3630  
File No.: G09.06  
10CFR50.90

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

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Proposed Amendment to the  
Units 1 and 2 Technical Specification 6.4.1

Houston Lighting & Power Company (HL&P) proposes to amend Technical Specification 6.4.1 for the South Texas Project Electric Generating Station (STPEGS) as shown in the attachments. This amendment would remove reference to Appendix A of 10CFR55 and the supplemental requirements in Sections A and C of Enclosure 1 of the March 28, 1980 letter from Harold Denton regarding Licensed Operator retraining to make the STPEGS Technical Specifications consistent with regulatory language and format.

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 Assessment for 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.

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

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

A1/045.N14

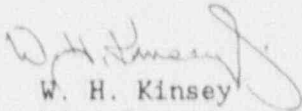
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A Subsidiary of Houston Industries Incorporated

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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.

  
W. H. Kinsey  
Vice President  
Nuclear Generation

PLW/amp

- Attachments: 1. Significant Hazards Evaluation for a  
Proposed Change in Training Requirements
2. Proposed Technical Specification 6.4.1

cc:

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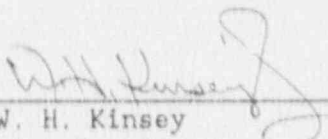
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

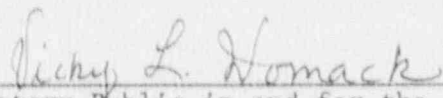
In the Matter )  
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Houston Lighting & Power ) Docket Nos. 50-498  
Company, et al., ) 50-499  
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South Texas Project )  
Units 1 and 2 )

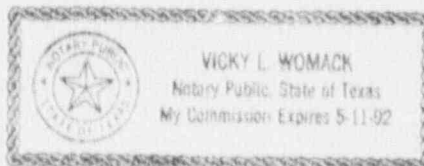
AFFIDAVIT

W. H. Kinsey being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation, 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 6.4.1 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.

  
\_\_\_\_\_  
W. H. Kinsey  
Vice President  
Nuclear Generation

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 8<sup>th</sup> day of January, 1991.

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



ATTACHMENT 1  
SIGNIFICANT HAZARDS EVALUATION  
FOR A PROPOSED CHANGE IN  
TRAINING REQUIREMENTS



SIGNIFICANT HAZARDS EVALUATION  
FOR A PROPOSED CHANGE IN  
TRAINING REQUIREMENTS

Background

Technical Specification 6.4.1 (Training) currently states that:

A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to licensees, and shall include familiarization with relevant industry operational experience.

10 CFR Part 55 was revised in April, 1987, and no longer contains an Appendix A.

The March 28, 1980 letter was issued by Mr. Harold Denton of the NRC. Sections A and C of Enclosure 1 to this letter provided supplemental requirements of a retraining and replacement training program for the unit staff. The response to Question 1 of NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," addresses supersession of training requirements in the Denton letter by the new rule:

- Q. 1. The Supplemental Information to NRC Generic Letter 87-07 states that, "These rules supersede all current regulations for operator licenses." Are training requirements from Mr. H. R. Denton's March 28, 1980 letter superseded by the new rule?
- A. The rule supersedes all requirements where those requirements are less restrictive. Where individual commitments are more restrictive, you must follow those commitments until you change them.

Proposed Change

This change deletes reference to Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter from Harold Denton.

### Safety Evaluation

Reference to 10CFR55 Appendix A can be deleted because the current revised 10CFR55 addressed by the Licensed Operator Requalification Training Program does not include an Appendix A. Reference to the Denton March 28, 1980 letter can be deleted because its requirements have been superseded by the revised 10CFR55. The requirements of the revised rule take into account the requirements of the Denton letter.

The Licensed Operator Requalification Training Program has been reviewed and approved by the NRC (see NRC correspondence dated September 12, 1989) as having met the NRC's training requirements.

### 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. Because no aspects of the STPEGS Operator Training Program that are important to safety are removed or diminished, the proposed amendment will not involve a significant increase in the probability or consequences of any accident previously evaluated.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment is administrative in nature and does not involve any changes to plant design or configuration or overall training of the plant operators. Therefore, the proposed change will not create the possibility of a new or different kind of accident.
3. The proposed change does not involve a significant reduction in the margin of safety. The proposed amendment does not remove or diminish any elements of the nuclear training program that are essential to the safe operation of STPEGS. It does not involve any changes to plant operating systems or associated safety analyses. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Conclusion

The Commission has provided guidance concerning application of the standards for determining whether a significant hazards consideration exists. This guidance includes examples (51FR7750) of the type of amendments considered not likely to involve significant hazards considerations. The change proposed is similar to the examples of administrative changes identified in 51FR7750 because the proposed change is to make the Technical Specifications consistent with 10CFR55 as revised in April, 1987.