

The Light Company

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

January 7, 1991
ST-HL-AE-3666
File No.: G25
10CFR50.36

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

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-498
Waiver of Compliance for Technical
Specification 3.3.3.1 Table 3.3-6, Functional Unit 1a

Houston Lighting and Power (HL&P) requests a Waiver of Compliance from the requirements of Technical Specification 3.3.3.1, Table 3.3-6, Functional Unit 1a. HL&P proposes that the subject requirements be waived for the period of the Integrated Leak Rate Test (ILRT) for Unit 1. This ILRT could start as early as January 8, 1991 but is scheduled to start January 9, 1991. This is a one time waiver. A request for a Technical Specification change will be submitted in time to support NRC review and approval prior to the ILRT for Unit 2 (expected to be performed during October of 1991).

The following is information required in the NRC letter dated February 22, 1990 on Waivers of Compliance.

1) Discussion of the Requirements for which a Waiver is requested.

Technical Specification 3.3.3.1 Table 3.3-6, Functional Unit 1a requires that the Containment Atmosphere Radioactivity-High monitor be operable in all modes of operation. The action statement requires that when this condition cannot be met, that operation may continue for 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours. It is requested that the requirement to have the subject monitor operable and the requirement to take grab samples be waived for the duration of the ILRT.

2) Discussion of the Circumstances Surrounding this Request.

Unit 1 will perform an ILRT and the subject monitor will be required to be isolated from containment because it is not designed for the pressure of an ILRT. HL&P has determined that there is no practical method to obtain grab samples without compromising the data collection for the ILRT.

A Subsidiary of Houston Industries Incorporated

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3) Compensatory Actions.

The Containment Atmosphere Radioactivity-High Monitor will be one of the last components isolated prior to the ILRT. Upon isolation the requested Waiver of Compliance time period would start. A containment atmosphere grab sample will be taken at the start of depressurization of containment after the ILRT. This will end the time period of the requested waiver.

4) Safety Significance and Potential Consequences of the Proposed Request.

There is no safety significance or potential consequences with the proposed request.

Per STPEGS UFSAR Ch.11.5, the monitor's function is to support the reactor coolant pressure boundary leakage detection system. This system is governed by other Technical Specifications which are applicable in MODES 1, 2, 3, and 4. STP Unit 1 is in MODE 5 and will be in MODE 5 for the ILRT. The monitor has no ESFAS or reactor protection system function, nor does it have any control function.

With STPEGS in MODE 5 at minimal pressure and temperature, there are no credible accident scenarios. In addition, during the time period of the requested waiver, containment will be isolated and personnel will not be allowed in containment.

5) Justification for the Duration of the Request.

The Technical Specification requirements should be waived for the duration of the ILRT. Once the containment is sufficiently depressurized, normal operation of the monitors will be restored. The ILRT is expected to last less than 92 hours.

6) No Significant Hazards Consideration.

- a. The proposed waiver of compliance does not involve a significant increase in the probability or consequences of an accident previously evaluated. The previously evaluated accidents are a Fuel Handling Accident, LOCA, Steam Line Break or Rod Ejection. A Fuel Handling Accident can not occur since fuel will not be moved inside containment during the ILRT. Design bases LOCA, Steam Line Break or Rod Ejection are not credible since the ILRT will be performed in Mode 5 with the reactor at less than or equal to 200°F.

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- b. The proposed waiver of compliance will not increase the possibility of a new or different kind of accident from any accident previously evaluated. The radiation monitor has no function which is associated with accident initiation.
- c. The proposed waiver of compliance does not involve a significant reduction in a margin of safety. The monitor serves no control function or accident mitigation function and the conditions for which it has a detection function are not credible for the duration of the waiver. Therefore, there is not a significant reduction in the margin of safety.

7) Irreversible Environmental Consequences.

HL&P has reviewed the proposed waiver of compliance and the NRC Final Environmental Assessment for STPEGS Units 1 and 2 and has concluded that pursuant to 10CFR51, there are no significant radiological or non-radiological impacts associated with the proposed waiver of compliance. Since there are no feasible accidents during the time period of the ILRT, there can not be any irreversible environmental consequences.

HL&P believes this waiver is consistent with protecting the public health and safety. Its approval will allow performance of the ILRT, which will demonstrate the integrity of the STPEGS Unit 1 containment in accordance with the requirements of Specification 3/4.6.1.2.

HL&P does not believe these circumstances could reasonably have been predicted and avoided. This is the first time the ILRT has been performed with Technical Specifications in effect. Furthermore, the usual time allowed for planning was not available because the present forced outage, in conjunction with the decision to refuel, has accelerated the normal planning process. Under normal circumstances the outage planning would likely have found this discrepancy in time for more timely resolution.

The STPEGS Plant Operations Review Committee (PORC) has reviewed and approved the proposed Waiver of Compliance.

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 Jr.
 W. H. Kinsey Jr.
 Vice President,
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GCS/hg

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INSTRUMENTATION

3/4.3.3 MONITORING INSTRUMENTATION

RADIATION MONITORING FOR PLANT OPERATIONS

LIMITING CONDITION FOR OPERATION

3.3.3.1 The radiation monitoring instrumentation channels for plant operations shown in Table 3.3-6 shall be OPERABLE with their Alarm/Trip Setpoints within the specified limits.

APPLICABILITY: As shown in Table 3.3-6.

ACTION:

- a. With a radiation monitoring channel Alarm/Trip Setpoint for plant operations exceeding the value shown in Table 3.3-6, adjust the Setpoint to within the limit within 4 hours or declare the channel inoperable.
- b. With one or more radiation monitoring channels for plant operations inoperable, take the ACTION shown in Table 3.3-6.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each radiation monitoring instrumentation channel for plant operations shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and DIGITAL CHANNEL OPERATIONAL TEST for the MODES and at the frequencies shown in Table 4.3-3.

SOUTH TEXAS - UNITS 1 & 2

3/4 3-51

AMENDMENT NOS.

AND

TABLE 3.3-6
RADIATION MONITORING INSTRUMENTATION FOR PLANT OPERATIONS

<u>FUNCTIONAL UNIT</u>	<u>CHANNELS TO TRIP/ALARM</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ALARM/TRIP SETPOINT</u>	<u>ACTION</u>
1. Containment					
a. Containment Atmosphere Radioactivity-High	N.A.	3	All	N.A.	31
b. RCS Leakage Detection					
1) Particulate Radioactivity	N.A.	1	1, 2, 3, 4	N.A.	34
2) Gaseous Radioactivity	N.A.	1	1, 2, 3, 4	N.A.	34

TABLE 3.3-6 (Continued)

ACTION STATEMENTS

- ACTION 31 - With less than the Minimum Channels OPERABLE requirement, operation may continue for up to 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours.
- ACTION 32 - (Not Used)
- ACTION 33 - (Not Used)
- ACTION 34 - Must satisfy the ACTION requirement for Specification 3.4.6.1.