

# The Light company

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

November 7, 1994  
ST-HL-AE-4924  
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 & 2  
Docket Nos. STN 50-498, STN 50-499  
Unit 1 and Unit 2 Technical Specification 3.8

Houston Lighting & Power Company (HL&P) proposes to amend its Operating Licenses NPF-76 and NPF-80 for the South Texas Project Electric Generating Station (STPEGS), Units 1 and 2, by incorporating the attached proposed change to Technical Specifications 3.7.7, 3.8.1.2, 3.8.2.2, 3.8.2.3 and 3.9.12. In addition the attached proposal will add Technical Specifications 3.8.1.3 and 3.8.1.4. The purpose of this amendment is to change the number of diesel generators required to be operable during Mode 5 with the loc<sub>ps</sub> filled and Mode 6 with greater than or equal to 23 feet of water above the reactor vessel flange.

HL&P has reviewed the attached 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 South Texas Project Electric Generating Station Nuclear Safety Review Board has reviewed and approved the proposed changes.

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

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TSC-94/94-311 003

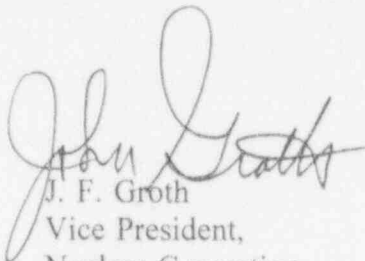
Project Manager on Behalf of the Participants in the South Texas Project

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ADD

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 call Mr. S. H. Head at (512) 972-7136 or myself at (512) 972-8664.



J. F. Groth  
Vice President,  
Nuclear Generation

LW/pas

- Attachment:
1. Affidavit
  2. Safety Evaluation and No Significant Hazards Consideration Determination
  3. Mark-ups of Proposed Change to Technical Specifications 3.8.1.2, 3.8.1.3, 3.8.1.4, 3.8.2.2, 3.8.2.3, 3.7.7 and 3.9.12

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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C:

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ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

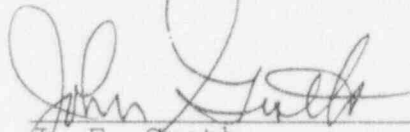
Houston Lighting & Power )  
Company et al., )

Docket Nos. 50-498  
50-499

South Texas Project )  
Units 1 and 2 )

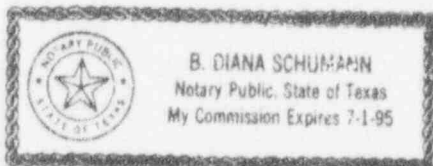
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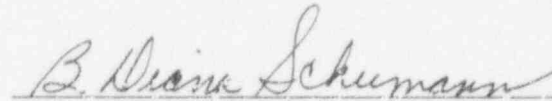
I, J. F. Groth, being duly sworn, hereby depose and say that I am Vice President, Nuclear Generation, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached revision to proposed changes to Technical Specification 3.8.1.2, 3.8.2.2, 3.8.3.2, 3.7.7 and 3.9.12; 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 7<sup>th</sup> day of NOVEMBER, 1994.



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

ATTACHMENT 2

SAFETY EVALUATION  
AND  
NO SIGNIFICANT HAZARDS  
CONSIDERATION DETERMINATION

## **BACKGROUND**

South Texas Project has identified restrictions in the Technical Specifications that impede the ability to reduce refueling outage duration. South Texas Project has three safety trains, including three Standby Diesel Generators in each unit. Current Technical Specifications allow one Standby Diesel Generator to be inoperable in Modes 5 and 6. This causes maintenance on the Standby Diesel Generators to be completed in series, many times on critical path.

A design review to identify the systems and components required for Modes 5 and 6 has been completed. This review shows that it is possible to safely operate and to mitigate all applicable accidents in Modes 5 and 6 with one Standby Diesel Generator and one train of accident mitigation equipment.

Based on the result of this design review, this submittal requests changes to several Mode 5 and 6 related Technical Specifications. The changes permit operation with a single Standby Diesel Generator operable during Mode 5 with the loops filled and Mode 6 when the Reactor Coolant System cavity is flooded to greater than 23 feet. During operation in Mode 5 loops not filled and Mode 6 less than 23 feet, the proposal retains the current requirement for two Standby Diesel Generators. These changes also provide the option for an alternate diesel generator, capable of powering the loads required for shutdown cooling, to be substituted for one of the Standby Diesel Generators in the latter case. A permanent modification (discussed in detail later in this attachment) will facilitate the connection of this alternate power source to the onsite distribution system. These proposed specifications are compatible with those for the shutdown cooling function. Further, they ensure the availability of a diesel-backed power supply. This will provide additional flexibility for outage management and minimize the impact of the diesel maintenance on the outage schedule.

The change to permit operation with a single Standby Diesel Generator during Modes 5 and 6 directly affects Technical Specification 3.8.1.2. A review of all the South Texas Project Technical Specifications found that certain system specifications are also affected by the changes for the emergency power supply. Because of the dependency of these other sections on Technical Specification 3.8.1.2, the proposed changes to four other specifications are included in this evaluation. The changes to the Technical Specifications proposed by this submittal are:

3.8.1.2	A.C. Sources, Shutdown
3.8.1.3	A.C. Sources, Shutdown
3.8.1.4	A.C. Sources, Shutdown
3.8.2.2	D. C. Sources, Shutdown
3.8.3.2	Onsite Power Distribution, Shutdown
3.7.7	Control Room Makeup and Cleanup Filtration System
3.9.12	Fuel Handling Building Exhaust Air System