February 14, 1995 ST-HL-AE-4991 File No.: G26 10CFR50.73

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

> South Texas Project Unit 2 Docket No. STN 50-499 Revision 1 to Voluntary Licensee Event Report 93-011 Pressurizer Safety Valve and Main Steam Safety Valve Setpoints Outside Required Tolerance

Pursuant to 10CFR50.73, Houston Lighting & Power Company submits the attached revision to Unit 2 Voluntary Licensee Event Report 93-011, regarding Pressurizer Safety Valve and Main Steam Safety Valve setpoints outside required tolerance. This event did not have an adverse effect on the health and safety of the public.

The purpose of this revision is to incorporate information regarding several Main Steam Safety Valve and Pressurizer Safety Valve setpoints that were found to be out of tolerance during past outages. The out of tolerance conditions of the Main Steam and Pressurizer Safety Valves were evaluated for impact to the design basis analysis. The safety analysis concluded that all criteria are met, thus, the past safety analyses bounded each situation. This revision includes an expanded safety analysis regarding out of toleracce conditions and their impact on Unit operation. Changes are indicated by revision bars.

This Licensee Event Report was originally submitted prior to the issuance of the guidance which was provided by letter from Mr. S. J. Collins, Nuclear Regulatory Commission Division Director of Reactor Safety, to Mr. W. T. Cottle, Nuclear Group Vice President, Houston Lighting & Power, dated December 8, 1993. This guidance clarified interpretation of reporting requirements related to out of tolerance conditions on primary or secondary safety relief valves. Prior to the issuance of this guidance, Houston Lighting & Power had a different interpretation of the application of this reporting requirement.

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The original Licensee Event Report was focused on Pressurizer Safety Valves and did not include identification of similar conditions on the Main Steam Safety Valves or prior occurrences of these conditions. Additionally, the original Licensee Event Report did not provide an evaluation of the impact of the out of tolerance condition on the design basis analysis. After analysis of the out of tolerance data, it was determined that the out of tolerance conditions experienced as a result of the Pressurizer Safety and the Main Steam Safety Valves did not result in a condition that was unanalyzed or outside the design basis of the plant.

Houston Lighting & Power will ensure that this guidance is appropriately applied to out of tolerance conditions for surveillances in future outages. Personnel have been sensitized to the analysis and reporting requirements for these type of conditions.

If you should have any questions on this matter, please contact Mr. J. M. Pinzon at (512) 972-8027 or me at (512) 972-8787.

T. H. Cloninger Vice President,

Nuclear Engineering

JMP/lf

Attachment: Revision 1 to Voluntary LER 93-011 (South Texas, Unit 2)

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