



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

May 21, 1992

Market Nos. 50-498
and 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: SOUTH TEXAS PROJECT UNITS 1 AND 2 - REQUEST FOR TEMPORARY WAIVER
OF COMPLIANCE AND EMERGENCY TECHNICAL SPECIFICATION AMENDMENT -
TECHNICAL SPECIFICATION 4.3.1.1, REACTOR TRIP SYSTEM
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

This acknowledges the granting of a temporary waiver of compliance to the South Texas Project, Units 1 and 2 from the provisions of Technical Specification (TS) 4.3.1.1 regarding the surveillance testing of the manual reactor trip function. This waiver was initially provided verbally on May 19, 1992, by B. A. Boger, Director, Division of Reactor Projects III/IV/V, with the concurrence of the NRC's Region IV office. This verbal request and the subsequent granting of the waiver was required due to the time constraints associated with the South Texas Project TS which would have required placing both units in at least Hot Standby within seven hours of the manual reactor trip function being declared inoperable. The decision to grant the waiver was based upon the assessment that a high confidence exists that the manual trip function will perform if called upon and that even if the function is unavailable, plant safety is ensured by the redundancy of the reactor trip system and the availability of other safety systems. In addition, you have delineated specific compensatory actions that can be taken by control room operators in the event the manual trip feature does not function. Your submittal dated May 20, 1992, provides the written request for the waiver, an emergency TS amendment request to revise TS 4.3.1.1, and the required supporting documentation.

NRR performed an evaluation based upon the information provided verbally and the subsequent written request and supporting documentation and determined that it adequately supported your request for a temporary waiver of compliance. This temporary waiver of compliance shall be valid until NRR has completed its review of your proposed TS amendment in accordance with the emergency provisions of 10 CFR 50.91(a)(5) and 10 CFR 50.92(c).

Table 3.3-1 of TS 3.3.1 specifies that the minimum number of operable channels of the manual reactor trip function is two and the surveillance requirements of Table 4.3-1 of TS 4.3.1 require a trip actuating device operational test (TADOT) be performed for each channel at least once per 18 months. Note 14 to Table 4.3-1 states that the TADOT for the manual reactor trip function shall independently verify the operability of the undervoltage and shunt trip

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circuits for the reactor trip breakers and the reactor trip bypass breakers. During a biennial review of your procedures, it was discovered that the TADOT which has been used at South Texas Project had not included testing of some electrical contacts associated with the shunt trip function.

The TADOT had verified the operability of those contacts which actuate both the shunt trip and undervoltage trip relays and the reactor trip breaker TADOT verifies the actual shunt trip and undervoltage trip attachments of the reactor trip breakers. Plant pre-operational testing included testing of the manual shunt trip circuitry. In addition, the manual trip function has been used successfully on several occasions to initiate a reactor trip. The above testing and functional history, while not specifically demonstrating the current operability of the manual shunt trip circuitry, provides reasonable assurance that the manual reactor trip function will perform if called upon. The redundancy of the Reactor Trip System design and the existence of other safety systems and procedures to mitigate the consequences of a failure of the Reactor Trip System also contribute to the conclusion that South Texas Project can delay the testing of the manual shunt trip circuitry until the next planned or unplanned plant shutdown.

Your request also stated that a review has been performed for those surveillance procedures for the manual reactor trip function, safety injection input from the Engineered Safety Feature Actuation System (ESFAS), automatic trip and interlock logic, and reactor trip bypass breakers. No additional deficiencies associated with TS were discovered but a procedure associated with the manual safety injection would be revised to incorporate independent verification of the shunt trip circuit. In addition, other reactor trip system and ESFAS surveillances will be reviewed to confirm that all TS requirements are being satisfied. The schedule for the review will be provided in the Licensee Event Report to be submitted by June 18, 1992. If the performance of periodic surveillances or the findings of the ongoing reviews affect the information provided in your request which provided the basis for granting this relief, you should notify the NRC.

As discussed above, your submittal included a request for an emergency TS amendment to provide a schedule for the operability verification of the manual shunt trip circuitry. The TS amendment involves a change to Note 14 to Table 4.3-1 which will require that testing be performed prior to restarting from the first planned or unplanned shutdown which occurs after May 19, 1992. The testing will verify the operability of the manual shunt trip function and thereby satisfy the surveillance requirements of TS 4.3.1. NRR is currently reviewing your submittal.

Mr. Donald P. Hall

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If your understanding of this matter differs from that expressed above or you have any questions regarding this action, please contact me.

Sincerely,

Bruce A. Boger for

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

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