

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Waco, Texas 77483

August 10, 1992

ST-HL-AE-4176

File No.: G9.06

G20.01

10CFR50.90

10CFR50.92

10CFR50.54(f)

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

South Texas Project Electric Generating Station
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Supplemental Information Regarding
Proposed Amendment to the Unit 1 and Unit 2
Technical Specifications 3/4.4.4 and 3/4.4.9

References:

1. Letter dated December 21, 1990
(ST-HL-AE-3642), Proposed Amendment to the
Unit 1 and Unit 2 Technical Specifications
3/4.4.4 and 3/4.4.9
2. Letter dated November 8, 1991, Issuance of
Amendment Nos. 31 and 22 to Facility
Operating License Nos. NPF-76 and NPF-80 -
South Texas Project, Units 1 and 2
(TAC Nos. 77380 and 77381)

Pursuant to 10CFR50.90, Houston Lighting & Power Company (HL&P) hereby proposes to amend its Operating Licenses NPF-76 and NPF-80 by incorporating the attached proposed change to the Technical Specifications for the South Texas Project Electric Generating Station (STPEGS) Units 1 and 2.

Based on technical studies for GI-70 (NUREG 1316) and GI-94 (NUREG 1326), pursuant to 10CFR50.54(f) the staff requested that actions identified in Generic Letter 90-06, Enclosure(s) A and B of Section 3, be taken by licensees in order to increase plant safety and reliability. Implementation of the 10CFR50.54(f) request requires HL&P to modify Technical Specifications 3/4.4.4 and 4.4.9.

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A Subsidiary of Houston Industries Incorporated

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A proposed amendment to the Unit 1 and Unit 2 Technical Specifications 3/4.4.4 and 3/4.4.9 was submitted on December 21, 1991, (ref. 1), and a portion of the proposed amendment was approved per Reference 2. Additional justification for the unapproved portion of the proposed amendment to the Technical Specification was requested per telecon by the NRC Project Manager for the South Texas Project.

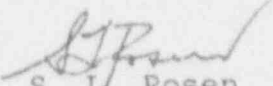
Attached is the proposed change to the STPEGS Technical Specifications and the additional justification as requested. Upon approval of the proposed change by the Staff, HL&P requests a 10 days implementation period following the date of issuance of the license amendment. This will allow adequate time for reproduction and distribution of the change and to bring STP procedures into compliance.

HL&P has reviewed the 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 Statement related to the operation of 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.

If you should have any questions concerning this matter, please contact Mr. A. W. Harrison at (512) 972-7298 or myself at (512) 972-7138.


S. L. Rosen
Vice President,
Nuclear Engineering

SDP/ag

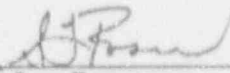
- Attachments: 1. Proposed Technical Specification Changes
2. Technical Specification Page Mark-ups.
3. Significant Hazards Evaluation

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)
Unit 1 and 2)

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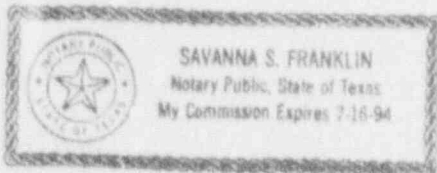
S. L. Rosen being duly sworn, hereby deposes and says that he is Vice President, Nuclear Engineering of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the Proposed Amendment to the Unit 1 and Unit 2 Technical Specifications 3/4.4.4 and 3/4.4.9; 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.




S. L. Rosen
Vice President,
Nuclear Engineering

STATE OF TEXAS)
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Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 10th day of August, 1992.





Notary Public in and for the
State of Texas

Houston Lighting & Power Company
South Texas Project Electric Generating Station

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CC:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
c/o U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

D. E. Ward/T. M. Puckett
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
P.O. Box 1088
Austin, TX 78767

K. J. Fiedler/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61867
Houston, TX 77208

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 0/11/91

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ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGES

PROPOSED TECHNICAL SPECIFICATION CHANGES

The proposed changes made to the current STPEGS Technical Specifications incorporate the recommendations provided in Generic Letter 90-06. Changes to improve clarity and accuracy of the Technical Specifications are also included. Additional changes are included to implement verification of PORV operability during MODES 5 & 6 as approved by the NRC in Reference 2.

CHANGES IN RESPONSE TO GENERIC LETTER 90-06

DESCRIPTION OF CHANGES AND JUSTIFICATION

Technical Specification 3/4.4.4

LCO 3.4.4:

Change and Justification:

- The word "All" is replaced with "Both". The Limiting Condition for Operation statement is clarified by replacing "All" with "Both" since the STPEGS COMS system consists of two PORVs. This change is considered editorial only.

Action (a.):

Changes and Justification:

- The word "more" is changed to "both". The action statement is clarified by changing "more" to "both" since only two PORVs are provided in the design. This change is considered editorial only.
- The statement "with power maintained to the block valve(s)" is added. The requirement to maintain power to closed block valve(s) is included because removal of power would render the block valve(s) inoperable and the requirements of Action statement (b. or c.) would apply.
- The requirement to reach "COLD SHUTDOWN within the following 30 hours" is changed to "HOT SHUTDOWN within the following 6 hours". This phrase has been changed because the APPLICABILITY requirements of the LCO do not extend beyond the HOT STANDBY mode.

Action (b.):

Change and Justification:

- The requirement to reach "COLD SHUTDOWN within 30 hours" is changed to "HOT SHUTDOWN within 6 hours" because the APPLICABILITY requirements of the LCO do not extend beyond the HOT STANDBY mode.

Action (c.):

Changes and Justification:

- The reference to "PORV(s)" and "valve(s)" is changed to "PORVs" and "valves" since this action only applies when both PORVs are inoperable. This improves clarity and is considered editorial only.
- The requirement to reach "COLD SHUTDOWN within 30 hours" is changed to "HOT SHUTDOWN within 6 hours" because the APPLICABILITY requirements of the LCO do not extend beyond the HOT STANDBY mode.
- The statement "within 1 hour either restore each of the PORVs" is changed to "within 1 hour either restore one of the PORVs". The recommended Technical Specification changes provided in Attachment A-1 to the Generic Letter state that "within 1 hour restore at least one PORV". The intent of this action is to provide for the removal of power from a closed block valve as additional assurance to preclude any inadvertent block valve opening at a time when the PORV may not be closed due to maintenance to restore it to operable condition. Since the entry condition for this action statement is both PORVs inoperable, it follows that one should be restored within 1 hour or its associated block valve closed.

Action (d.):

Change and Justification:

- This action applies to the case when one block valve is inoperable and is the result of splitting the previous Technical Specification action (d.) into two action statements for clarity. This change is made to provide an action statement applicable to one block valve inoperable and an action statement applicable to two block valves inoperable. The PORVs are to be placed in "closed position" rather than "manual control" as recommended by Generic Letter 90-06. Placing the valves in "closed position" rather than "manual control" is appropriate since this action is required to prevent the automatic opening of the PORVs which is the intent of the step in the Technical Specification change recommended in Generic Letter 90-06.

Action (e.):

Change and Justification:

- This action applies to the case when both block valves are inoperable and is the result of splitting the previous Technical Specification action (d.) into two separate action statements for clarity. This change is made to provide an action statement applicable to one block valve inoperable and an action statement applicable to two block valves inoperable.

Action (f.):

Change and Justification:

- Action (f.) comes from the previous Technical Specification action (e.). This is a result of splitting the Previous Technical Specification action (d.) into two actions and re-numbering the actions. This change is editorial only.

Surveillance Requirement 4.4.4.1.a:

Change and Justification:

- The statement "on the PORV actuation channel" is added to enhance clarity. There is no change to the existing requirements. This change provides consistency with Surveillance Requirement 4.4.9.3.1.b.

Surveillance Requirement 4.4.4.1.b:

Change and Justification:

- The statement "during MODES 3, 4, or 5" is incorporated. This is so testing can be performed prior to establishing conditions where the PORVs are used for low temperature overpressure protection but not during power operations. The addition of MODE 5 to this surveillance requirement provides additional operational flexibility in the performance of the required test.

Surveillance Requirement 4.4.4.2:

Change and Justification:

- The statement "with power removed" is deleted. This statement is not required since it is incorporated into the requirements of ACTION b. and c. of specification 3.4.4.

Generic Letter Surveillance Requirement 4.4.4.3:
Response and Justification:

- Surveillance Requirement 4.4.4.3, provided in the Generic Letter, is not incorporated. This Surveillance Requirement is provided in the Generic Letter to require testing of emergency (backup) power supplies for plants with non-safety grade power. This surveillance requirement is not included in the STPEGS Technical Specifications since the STPEGS PORVs are powered from class 1E buses.

Generic Letter Surveillance Requirement 4.4.4.1.b:
Response and Justification:

- Surveillance Requirement 4.4.4.1.b as provided in the Technical Specifications changes recommended by Generic Letter 90-0000 are incorporated. This Surveillance Requirement applies to plants with air-operated PORVs. This is not applicable to STPEGS since solenoid operated PORV are installed.

Technical Specification 3/4.4.9

Limiting Condition for Operation 3.4.9.3:
Change and Justification:

- Requested changes to this Technical Specification are described in Reference 1. These changes were approved as an amendment per Reference 2.

Surveillance Requirement 4.4.9.1.2:
Change and Justification:

- Technical Specification Figure 3.4-4, "Nominal Maximum Allowable PORV Setpoint for the Cold Overpressure System," is added to the listing of figures to be updated based on the results of the Reactor Pressure Vessel (RPV) irradiation surveillance program. The change is made to emphasize the need to update the figure and the allowable PORV setpoint based on results of the RPV irradiation surveillance program.

Basis 3/4.4.4

RELIEF VALVES

Change and Justification:

- Basis 3/4.4.4 is revised to clarify the functions for which operability of the PORV and block valve are determined. Operability of the PORV is not based on the automatic control function. Inoperability of the PORVs automatic function during normal operation does not result in inoperability of the PORVs manual operation. This clarification is consistent with the STP design.

Bases 3/4.4.9

Low Temperature Overpressure Protection

Change and Justification:

- The Low Temperature Overpressure Protection Bases is revised to add details concerning the use of RHR relief valves to provide COMS during the stroke testing of inoperable PORV(s). This change is consistent with Technical Specification 3.4.9.3 as approved in Unit 1 Amendment 31 and Unit 2 Amendment 22.