50-498

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 1, 1996

LICENSEE: Houston Lighting & Power Company

FACILITY: South Texas Project

SUBJECT: MEETING WITH HOUSTON LIGHTING & POWER COMPANY REGARDING CONVERSION OF THE SOUTH TEXAS PROJECT TECHNICAL SPECIFICATIONS TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

On Monday, June 24, 1996, a meeting was held with Houston Lighting & Power Company (the licensee), and the Nuclear Regulatory Commission (NRC) staff to discuss the licensee's proposed license amendment to convert the South Texas Project (STP) Technical Specifications (TSs) to the new Improved Standard Technical Specifications (ISTSs). The meeting was held at NRC headquarters in Rockville, Maryland, with representatives of the licensee and the staff. A notice of this meeting was issued by the staff on June 10, 1996. Attachment 1 is the list of attendees.

In a letter dated June 4, 1996, the licensee submitted a proposed license amendment to convert the STP TS to the ISTS format. The purpose of this meeting was to enable the licensee to provide the staff with the description of the STP submittal, identify points of contact within the staff and STP, and establish groundrules for communications between the NRC and STP during the review. The licensee's slides are provided in Attachment 2.

The licensee noted that STP differs from other plants in that they have three independent trains of engineered safeguards features. This 3-train application makes the ISTS conversion for STP slightly different from the Westinghouse ISTS in that allowed outage times (AOTs) for various systems are different. In addition, the proposed TS incorporate new required completion times for certain systems based on analyses performed using the STP probabilistic safety assessment (PSA).

The NRC Technical Specifications Branch indicated that it would be prudent for the staff to understand early in the process the logic behind setting completion times based on system risk ranking. For example, the licensee noted that systems that were ranked as low in risk significance were given AOTs of 28 days; systems that were ranked medium risk significance were given AOTs of 14 days; and systems of high risk significance were given AOTs of 7 days. The staff noted that a fundamental understanding of how the licensee identified particular systems as low, medium, or high, is necessary at an early point in the review process. The licensee indicated that the proposed amendment package included a PSA topical report supporting the revised required completion times. The staff also indicated that the TS bases should reflect as much of the PSA information on AOTs as possible.

Regarding communications between the staff and the licensee during the conversion process, the licensee stated that they have set up an internet address that can be used to funnel staff questions and issues to STP. The use

of electronic mail to submit questions to the licensee should result in a reduction in time required to process hard copies of staff questions. The staff indicated that initially, all questions would be sent to the NRC lead for the conversion process, Janet Kennedy, who would then send them to STP via the internet electronic mail address.

Finally, the Technical Specifications Branch requested that STP send in basic systems training materials, specific to STP, that would allow the NRC's contractors for the ISTS conversion to become familiar with the STP plant. The licensee stated they would submit those materials as soon as possible.

Janet L. Kennedy

Janet L. Kennedy, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Attachments: 1. List of Meeting Attendees
2. Meeting Slides

cc w/atts: See next page

cc:
Mr. David P. Loveless
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

Mr. J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Mr. M. T. Hardt
Mr. W. C. Gunst
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Mr. G. E. Vaughn/C. A. Johnson
Central Power and Light Company
P. O. Box 289
Mail Code: N5012
Wadsworth, TX 74483

INPO
Records Center
700 Galleria Parkway
Atlanta, GA 30339-3064

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

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

Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
Bay City, TX 77414

Mr. William T. Cottle
Group Vice President Nuclear
Houston Lighting & Power Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

Jack R. Newman, Esq.
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

Mr. Lawrence E. Martin
General Manager, Nuclear Assurance Licensing
Houston Lighting and Power Company
P. O. Box 289
Wadsworth, TX 77483

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

Joseph R. Egan, Esq.
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, DC 20037

Office of the Governor
ATTN: Andy Barrett, Director
Environmental Policy
P. O. Box 12428
Austin, TX 78711

Arthur C. Tate, Director
Division of Compliance & Inspection
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756

J. W. Beck
Little Harbor Consultants, Inc.
44 Nichols Road
Cohasset, MA 02025-1166

ATTENDEES AT MEETING OF JUNE 24, 1996

SOUTH TEXAS PROJECT IMPROVED STANDARD TECHNICAL SPECIFICATIONS

NAME	AFFILIATION
Janet Kennedy	NRC/NRR/DRPW
Chris Grimes	NRC/NRR/TSB
Nanette Gilles	NRC/NRR/TSB
Carl Schulten	NRC/NRR/TSB
Michael Felix	STP
Mark McBurnett	STP
Jerry Self	Excel
Allen Moldenhauer	STP
Wayne Harrison	STP
Donald Hoffman	Excel
Clyde Morton (telecon)	PQP Corporation

ATTACHMENT 1

PRESENTATION TO THE NUCLEAR REGULATORY COMMISSION

SOUTH TEXAS PROJECT
IMPROVED TECHNICAL SPECIFICATIONS

JUNE 24, 1996

ATTACHMENT 2

AGENDA

1.0 INTRODUCTION

2.0 DESCRIPTION OF IMPROVED TECHNICAL SPECIFICATION DEVELOPMENT AT THE SOUTH TEXAS PROJECT

3.0 DESCRIPTION OF SUBMITTAL PACKAGE

4.0 OVERVIEW OF SIGNIFICANT CHANGES

5.0 APPLICATION OF PROBABILISTIC SAFETY ASSESSMENT

6.0 REVIEW INTERFACES

INTRODUCTION
MEETING OBJECTIVES

- SOUTH TEXAS PROJECT IMPROVED TECHNICAL SPECIFICATIONS WERE SUBMITTED TO THE NRC BY LETTER DATED JUNE 4, 1996

- PURPOSE OF MEETING TO:

  1. PROVIDE THE NRC REVIEWERS WITH THE DESCRIPTION OF THE SOUTH TEXAS PROJECT SUBMITTAL

  2. IDENTIFY POINTS OF CONTACT WITHIN NRC AND STP FOR THE REVIEW

  3. ESTABLISH GROUNDRULES FOR COMMUNICATIONS BETWEEN THE NRC AND STP DURING THE REVIEW

INTRODUCTION
HISTORY AND SCHEDULE

- SOUTH TEXAS PROJECT IMPROVED TECHNICAL SPECIFICATIONS BEGUN AS INITIATIVE IN MID 1994
- OPPORTUNITY TO BETTER INCORPORATE SOUTH TEXAS PROJECT THREE TRAINS AND PROBABILISTIC SAFETY ANALYSIS
- SCHEDULE SUPPORTS IMPLEMENTATION IN LATE 1997

DESCRIPTION OF IMPROVED TECHNICAL SPECIFICATION DEVELOPMENT AT THE SOUTH TEXAS PROJECT

- ORGANIZATION
  - MULTI-DEPARTMENTAL REVIEW TEAM PERFORMED DETAILED REVIEW OF CONVERTED SPECIFICATIONS
    - THREE COMPLETE REVIEWS
    - SHIFT SUPERVISOR REVIEW
  - PLANT OPERATIONS REVIEW COMMITTEE DETAILED REVIEW
  - NUCLEAR SAFETY REVIEW BOARD IMPROVED TECHNICAL SPECIFICATIONS REVIEW COMMITTEE OVERSIGHT
    - INCLUDED DETAILED REVIEW OF SELECTED SECTIONS

DESCRIPTION OF SUBMITTAL PACKAGE

- STP SPECIFIC IMPROVED TECHNICAL SPECIFICATION
- STP SPECIFIC IMPROVED TECHNICAL SPECIFICATION BASES
- ANNOTATED CURRENT TECHNICAL SPECIFICATIONS AND DISCUSSION OF CHANGES TO CURRENT TECHNICAL SPECIFICATIONS
- NO SIGNIFICANT HAZARDS CONSIDERATIONS DETERMINATIONS AND ENVIRONMENTAL REVIEW
- DEVIATIONS FROM THE STANDARD IMPROVED TECHNICAL SPECIFICATIONS
- DEVIATIONS FROM THE STANDARD IMPROVED TECHNICAL SPECIFICATIONS BASES
- SPLIT REPORT
- PROBABILISTIC SAFETY ANALYSIS TOPICAL REPORT

DESCRIPTION OF SUBMITTAL PACKAGE (CONTINUED)

- EXPECT TO SUPPLEMENT THE APPLICATION TO INCORPORATE OTHER CHANGES

  STEAM GENERATOR TUBE PLUGGING CRITERIA (TWO AMENDMENTS RECENTLY APPROVED FOR CURRENT TECHNICAL SPECIFICATIONS)

  STEAM GENERATOR TUBE SLEEVING (CHANGE TO CURRENT TECHNICAL SPECIFICATIONS UNDER NRC REVIEW)

  STANDBY DIESEL GENERATOR AND ASSOCIATED SYSTEMS REQUIRED COMPLETION TIME EXTENSION (CHANGE TO CURRENT TECHNICAL SPECIFICATIONS UNDER NRC REVIEW)

  OTHER CHANGES MAY BE SUBMITTED AS NECESSARY

OVERVIEW OF SIGNIFICANT CHANGES

- REFORMATTED TECHNICAL SPECIFICATIONS - MORE "USER FRIENDLY" TABULAR FORMAT IN ACCORDANCE WITH THE IMPROVED STANDARD SPECIFICATIONS

- EXPANDED BASES ADDRESS LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

  SUPERIOR TO EXISTING BASES

  LICENSEE CONTROLLED IN ACCORDANCE WITH 10CFR50.59

- RELOCATED SPECIFICATIONS WHICH DO NOT MEET THE POLICY CRITERIA IN ACCORDANCE WITH THE IMPROVED STANDARD SPECIFICATIONS

  EXAMPLES:

  SEISMIC MONITORING
  METEOROLOGICAL INSTRUMENTATION
  SNUBBERS
  TURBINE OVERSPEED PROTECTION
  SECONDARY WATER CHEMISTRY
  CONTAINMENT BUILDING TENDON INSPECTION
  NSRB

OVERVIEW OF SIGNIFICANT CHANGES (CONTINUED)

- PROGRAMS TO REPLACE REQUIREMENTS PREVIOUSLY DETAILED IN THE SPECIFICATIONS IN ACCORDANCE WITH THE IMPROVED STANDARD SPECIFICATIONS

  EXAMPLES (SEE ATTACHED LIST FOR ALL PROGRAMS):

  EMERGENCY DIESEL GENERATOR OIL TESTING PROGRAM
  LEAK RATE TESTING PROGRAM
  STEAM GENERATOR TUBE TESTING PROGRAM

- MORE RESTRICTIVE REQUIREMENTS

  NEW SPECIFICATIONS:
  FEEDWATER REGULATING/BYPASS ISOLATION VALVES
  SPENT FUEL POOL/IN-CONTAINMENT STORAGE FUEL ARRANGEMENT

  SOME COMPLETION TIMES SLIGHTLY SHORTER THAN THE "3.0.3 CONDITION" FROM CURRENT SPECIFICATIONS

OVERVIEW OF SIGNIFICANT CHANGES (CONTINUED)

- LESS RESTRICTIVE REQUIREMENTS

  GENERIC RELIEF PROVIDED BY THE STANDARDS

  PLANT SPECIFIC CHANGES WHERE STP DESIGN IS DIFFERENT FROM STANDARD

- LESS RESTRICTIVE/ADMINISTRATIVE

  RELOCATION OF PRESCRIPTIVE DETAIL TO OTHER DOCUMENTS

- OVERALL BREAK-DOWN OF CHANGES

ADMIN	MORE REST.	LESS REST.	LESS REST./ADMIN	RELOCATED
413	136	207	177	21

APPLICATION OF PROBABILISTIC SAFETY ASSESSMENT

PROBABILISTIC SAFETY ASSESSMENT RISK-BASED ALLOWED OUTAGE TIMES

- RISK RANKING THRESHOLDS ESTABLISHED BASED ON THE EPRI PROBABILISTIC SAFETY ASSESSMENT GUIDELINE (TR-105396)

  ⇒ FUSSELL - VESELY IMPORTANCE > 0.05
  ⇒ RISK ACHIEVEMENT WORTH > 2.0

- SETTING ALLOWED OUTAGE TIMES BASED ON SYSTEM RISK RANKING

  ⇒ LOW - 28 DAYS
  ⇒ MEDIUM - 14 DAYS
  ⇒ HIGH - 7 DAYS

- CONFIGURATION RISK MANAGEMENT PROGRAM TO VERIFY ALLOWED OUTAGE TIMES

  ⇒ 1 TRAIN AOT < 1E-6
  ⇒ 2 TRAIN AOT < 1E-5

APPLICATION OF PROBABILISTIC SAFETY ASSESSMENT (CONTINUED)

SYSTEM	ITS SECTION	CURRENT TECH. SPEC. AOTs	PROPOSED TECH. SPEC. AOTs
CONTAINMENT SPRAY	3.6.6	7 DAYS/NA	28 DAYS/7 DAYS
REACTOR CONTAINMENT FAN COOLERS	3.6.6	7 DAYS/NA	28 DAYS/7 DAYS
RESIDUAL HEAT REMOVAL	3.5.2	7 DAYS/24 HR.	14 DAYS/7 DAYS
COMPONENT COOLING WATER	3.7.7	7 DAYS/NA	14 DAYS/24 HR
SAFETY INJECTION	3.5.2	7 DAYS/NA	7 DAYS/24 HR
STANDBY DIESEL GENERATORS	3.8.1 & 3.8.2	72 HR/2 HR	7 DAYS**/24 HR
AUXILIARY FEEDWATER	3.7.5	72 HOURS/6 HR*	7 DAYS/24 HR
ESSENTIAL CHILLED WATER	3.7.10	72 HOURS/NA	7 DAYS/24 HR
ESSENTIAL COOLING WATER	3.7.8	72 HOURS/NA	7 DAYS/24 HR
CONTROL ROOM HVAC	3.7.11	7 DAYS/72 HR	7 DAYS/24 HR

* B & C MOTOR DRIVEN AUXILIARY FEEDWATER TRAINS

** CURRENTLY PROPOSING A 14 DAY DG ALLOWED OUTAGE TIME

REVIEW INTERFACES

- STP REVIEW TO BE COORDINATED BY LICENSING

MARK McBURNETT	(512)972-7206	
WAYNE HARRISON	(512)972-7298	PRIMARY CONTACT
MIKE FELIX	(512)972-8620	
TED KOSER	(512)972-8963	

- USE OF E-MAIL TO FACILITATE RESOLUTION OF NRC QUESTIONS

104470.1634@compuserv.com

LIST OF PROGRAMS:

(1) Offsite Dose Calculations Manual (ODCM)
(2) Radioactive Effluent Controls Program (RECP)
(3) Primary Coolant Sources Outside Containment Leakage Program (PCSOCL)
(4) Component Cyclic or Transient Limit Program (CCTLP)
(5) Prestressed Concrete Containment Tendon Surveillance Program (PCCTSP)
(6) Inservice Testing Program (ISTP)
(7) Steam Generator Tube Surveillance Program (SGTSP)
(8 Reactor Coolant Pump Flywheel Inspection Program (RCPFIP)
(9) Emergency Diesel Generator Fuel Testing Program(EDGFTP)
(10) Post Accident Sampling Program (PASP)
(11) Secondary Water Chemistry Program (SWCP)
(12) Explosive Gas and StorageTank Radioactivity Monitoring Program (EGSTRMP)
(13) Diesel Generator Oil Testing Program (DGOTP)
(14) Ventilation Filter Testing Program (VFTP)
(15) Technical Specification Bases Control Program (TSBCP)
(16) Safety Function Determination Program (SFDP)
(17) Core Operating Limits Report (COLR)
(18) Reactor Coolant System Pressure and Temperature Limits Report (PTLR)

POLICY CRITERIA FOR INCLUDING REQUIREMENTS IN TECHNICAL SPECIFICATIONS:

1. INSTALLED INSTRUMENTATION USED TO DETECT, AND INDICATE IN THE CONTROL ROOM, SIGNIFICANT ABNORMAL DEGRADATION OF THE REACTOR COOLANT PRESSURE BOUNDARY;

2. A PROCESS VARIABLE, DESIGN FEATURE, OR OPERATING RESTRICTION THAT IS AN INITIAL CONDITION OF A DESIGN BASIS ACCIDENT OR TRANSIENT ANALYSES THAT EITHER ASSUMES THE FAILURE OF OR PRESENTS A CHALLENGE TO THE INTEGRITY OF A FISSION PRODUCT BARRIER;

3. A STRUCTURE, SYSTEM, OR COMPONENT THAT IS PART OF THE PRIMARY SUCCESS PATH AND WHICH FUNCTIONS OR ACTUATES TO MITIGATE A DESIGN BASIS ACCIDENT OF TRANSIENT THAT EITHER ASSUMES THE FAILURE OF OR PRESENTS A CHALLENGE TO THE INTEGRITY OF A FISSION PRODUCT BARRIER; AND

4. A STRUCTURE, SYSTEM, OR COMPONENT WHICH OPERATING EXPERIENCE OF PROBABILISTIC SAFETY ASSESSMENT HAS SHOWN TO BE SIGNIFICANT TO PUBLIC HEALTH AND SAFETY.

of electronic mail to submit questions to the licensee should result in a reduction in time required to process hard copies of staff questions. The staff indicated that initially, all questions would be sent to the NRC lead for the conversion process, Janet Kennedy, who would then send them to STP via the internet electronic mail address.

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ORIGINAL SIGINED BY:

Janet L. Kennedy, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-498 and 50-499

Attachments: 1. List of Meeting Attendees
2. Meeting Slides

cc w/atts: See next page

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J. Roe	P. Noonan	OGC (15B18)	C. Grimes
ACRS	C. Schulten	N. Gilles	

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