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

July 8, 1996
ST-HL-AE-5402
File No.: G20.01
G21.01
10 CFR 50.90

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Proposed Revision to Technical Specifications
Clarifying Surveillance Interval for Surge Tank Level Instrumentation

The South Texas Project proposes to amend its Operating License NPF-76 and NPF-80 for Units 1 and 2, respectively, by incorporating the attached proposed changes to the Technical Specifications. The purpose of this amendment is to clarify the interval for completing surveillance requirement 4.7.3.b.3 of the South Texas Project Technical Specifications.

The South Texas Project has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that the changes do not involve a significant hazards consideration. In addition, the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for environmental review. This determination is based on the conclusion that the proposed change does not involve a significant hazards consideration, will not involve significant changes in the types or amounts of radioactive effluent, does not affect any of the permitted release paths, and does not involve a significant increase in individual or cumulative occupational exposure.

The South Texas Project Nuclear Safety Review Board has reviewed and approved the proposed change.

The required affidavit, along with a Safety Evaluation and statement of No Significant Hazards Consideration Determination associated with the proposed changes, and the marked-up affected page of the Technical Specifications and the Bases are included as attachments to this letter.

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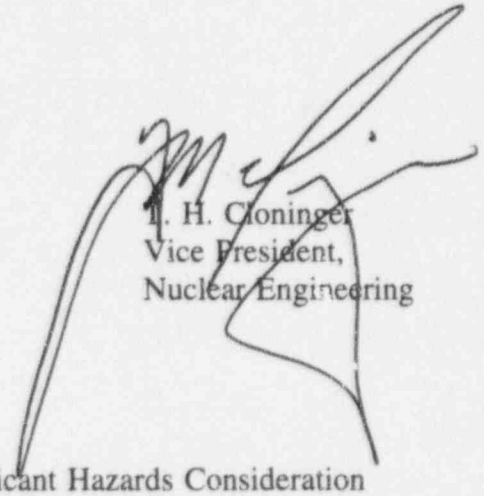
In accordance with 10CFR50.91(b), the South Texas Project is providing the State of Texas with a copy of this proposed amendment.





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

If there are any questions, please contact either Mr. P. L. Walker at (512) 972-8392 or me at (512) 972-8787.



T. H. Cloninger
Vice President,
Nuclear Engineering

PLW/lf

Attachments:
1) Affidavit
2) Safety Evaluation and No Significant Hazards Consideration
3) Markups of Proposed Changes to Technical Specifications

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# AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Houston Lighting & Power | ) | Docket Nos. 50-498 |
| Company, et al., | ) | 50-499 |
| | ) | |
| South Texas Project | ) | |
| Units 1 and 2 | ) | |

## AFFIDAVIT

I, T. H. Cloninger, being duly sworn, hereby depose and say that I am Vice President, Nuclear Engineering, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed revision to Technical Specification 3/4.7.3; 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.

T.H. Cloninger
Vice President,
Nuclear Engineering

STATE OF TEXAS )
)
COUNTY OF MATAGORDA )

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 8th day of July, 1996.

LINDA RITTENBERRY
Notary Public, State of Texas
My Commission Expires 10/9/97

Linda Rittenberry
Notary Public in and for the
State of Texas

# ATTACHMENT 2

ATTACHMENT 2

No Significant Hazards Consideration Determination

**Description of the Proposed Change:**

The South Texas Project requests an amendment to Technical Specification Surveillance Requirement 4.7.3.b.3 to clarify when the Component Cooling Water System surge tank level instrumentation is to be demonstrated operable by performance of a channel calibration test. This change will clarify the interval for completing this surveillance requirement.

The proposed changes are indicated on the Technical Specification page provided as Attachment 3 to this submittal.

**Description of Current Requirement:**

The Technical Specification Surveillance Requirement 4.7.3.b.3 states that at least three component cooling water loops shall be demonstrated operable at least once per 18 months during shutdown, by verifying that the surge tank level instrumentation which provides automatic isolation of portions of the system is demonstrated operable by performance of a channel calibration test.

**Safety Analysis:**

The South Texas Project requests a revision to Technical Specification 4.7.3.b.3 to clarify the interval for completing the channel calibration test for the Component Cooling Water System surge tank level instrumentation. This calibration can be performed during any plant mode since three-train redundancy ensures sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions.

The Component Cooling Water System surge tank is partitioned into three equal volumes by internal baffles. Each compartment is monitored by level instrumentation which provide automatic isolation at about 9 inches and about 12 inches above the tank centerline in the open, undivided portion of the surge tank. The associated Component Cooling Water train is taken out of service prior to performing the calibration. Calibration of the 9-inch instrumentation is done on a train basis, when the subject Component Cooling Water train is out-of-service and isolated. If level decreases to 9 inches above the tank centerline, the other two trains will isolate. Because the train in calibration is already out of service, the automatic isolation function of this instrumentation is not needed regardless of the plant mode. The 12-inch instrumentation which provides for isolation of non-safety cooling loads is disabled for the channel being calibrated. However, redundant isolation capability is provided by the two remaining 12-inch level instruments and, if surge tank level continues to decrease, from the 9-inch level instrumentation.

The worst credible challenge to the plant during this evolution is one additional Component Cooling Water train rendered inoperable with one train initially out of service. Should this occur, the third Component Cooling Water train would actuate, supplying water to the common header. Therefore, there is no significant increase in the probability or consequences of an accident previously evaluated.

**Bases of the Proposed Amendment:**

Clarification of the statement will remove an ambiguity concerning the plant conditions required for performing this calibration. The calibration will be performed in plant operational modes consistent with the continued safe operation of the plant. The frequency of this channel calibration is intended to be at least once per 18 months.

**Impact of the Proposed Change:**

Implementation of the proposed change to the surveillance criteria does not introduce significant or adverse changes to the plant design basis. The required intervals between surveillances, where specified, will continue to be met.

Based upon the above, the proposed amendment request has no significant negative impact on any system or operating mode.

**Implementation:**

The South Texas Project requests that this proposed amendment be given an expeditious review to support approval by September 16, 1996, and that the effective date for the change be 30 days after approval by the Nuclear Regulatory Commission.

## NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Pursuant to 10CFR50.91, this analysis provides a determination that the proposed change to the Technical Specifications does not involve any significant hazards consideration as defined in 10CFR50.92, as described below:

**1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed change to Technical Specification Surveillance Requirement 4.7.3.b.3 will not affect any accident initiators or precursors and will not alter the design assumptions for the systems or components used to mitigate the consequences of an accident. Calibration is performed on level instrumentation of Component Cooling Water System trains that are out of service for scheduled maintenance. Isolation redundancy is provided by instrumentation associated with the trains that are in service during the calibration. Since the surveillance will continue to be performed at the specified interval, this proposed change will not increase the probability of occurrence of an accident previously evaluated. The surveillance does not differ from those previously performed; therefore, there is no impact on the consequences of an accident previously evaluated.

**2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.**

Clarifying the surveillance interval for surge tank level instrumentation does not involve installation or operation of new or different kinds of equipment. There is no change in the procedure as described in the Technical Specifications. The change only clarifies the interval at which the subject calibration will be performed. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

**3. The proposed change does not involve a significant reduction in a margin of safety.**

The specified surveillance will remain as stated in the Technical Specifications. Consequently, there is no reduction in the effectiveness of the surveillance in ensuring equipment operability. Calibration is performed on level instrumentation of Component Cooling Water System trains that are out of service for scheduled maintenance. Isolation redundancy is provided by instrumentation associated with the trains that are in service during the calibration. Consequently, clarifying the interval at which the calibration is performed will have no significant impact on the margin of safety.

Based upon this evaluation, the South Texas Project has concluded that these changes do not involve any significant hazards considerations.