

The Light company

Houston Lighting & Power

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ST-HL-AE-2676
File No.: G26

Robert D. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Voluntary Entry into Technical Specification 3.0.3

As you are aware, South Texas Project Electric Generating Station (STPEGS) entered Technical Specification 3.0.3 to perform a short surveillance test to verify operability of two Steam Generator PORV's. The decision to perform this evolution was made by a Shift Supervisor after careful consideration of the design basis for the PORV's and the Technical Specification bases which states the following.

3.0.3 is not intended to be used as an operational convenience which permits (routine) voluntary removal of redundant systems or components from service...

This language was included in the bases for 3.0.3 in the Full Power Technical Specification in accordance with Generic Letter 87-009. In this case, the shift supervisor concluded that entry into Technical Specification 3.0.3 for short surveillance tests to confirm PORV operability was appropriate since it did not constitute a routine removal of safety related components.

As a result of NRC comments relative to this event and review of an internal NRC document (T. Murley's letter dated June 17, 1987), Houston Lighting & Power Company (HL&P) has now taken a very conservative position, directing that voluntary entry into 3.0.3 is not permitted other than pursuant to 10CFR50.54(x). If a definite need to voluntarily enter 3.0.3 exists, then the Shift Supervisor will contact the Plant Manager who after consideration of the situation may request discretionary enforcement.

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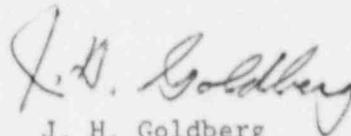
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HL&P believes that the NRC's intent relative to voluntary entry into Technical Specification 3.0.3 is not clearly worded and that the language used in Generic Letter 87-009, the Technical Specifications and the NRC's internal document could be interpreted differently by various utilities.

If the NRC intends that Technical Specification 3.0.3 not be entered voluntarily without invoking 10CFR50.54(x) or discretionary enforcement, then we recommend that generic language be provided such as the following.

Voluntary entry into Technical Specification 3.0.3 is prohibited unless either authorized by NRC discretionary enforcement action or failure to enter would create a threat to public health and safety.

If you have any questions or need further information, please contact M. A. McBurnett at (512)972-8530.



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