

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

October 29, 1998
NOC-AE-000263
File No.: G20.02.01
G21.02.01
10CFR50.90

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Proposed Amendment to Relocate Turbine Overspeed Protection
Technical Specification 3/4.3.4 to the Technical Requirements Manual

STP Nuclear Operating Company (STPNOC) proposes to relocate Specification 3/4.3.4, "Turbine Overspeed Protection," to the Technical Requirements Manual.

STPNOC has reviewed the proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, South Texas has determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment. The South Texas Plant Operations Review Committee and the Nuclear Safety Review Board have reviewed and approved the proposed amendment.

The required affidavit, a Safety Evaluation, the Determination of No Significant Hazards Consideration, the Environmental Assessment, the marked-up affected pages of the Technical Specifications, and the new /revised Technical Requirements Manual pages are included as attachments to this letter.

In accordance with 10CFR50.91(b), STPNOC is notifying the State of Texas of this request for license amendment by providing a copy of this letter and its attachments.

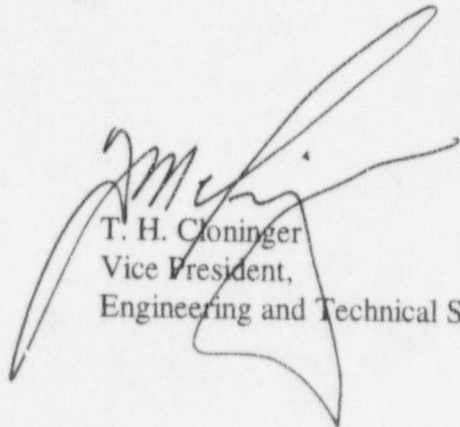
1/1
Add)

9811030238 981029
PDR ADOCK 05000498
P PDR

Although STPNOC acknowledges that this proposed amendment is not a Priority I request, STPNOC still desires that this proposed amendment be reviewed and approved by the second quarter of 1999 to allow for expeditious implementation of the change. South Texas also requests 30 days for implementation.

STPNOC has determined that there are no new licensing commitments identified in this submittal.

If there are any questions regarding the proposed amendment, please contact Mr. M. A. McBurnett at (512) 972-7206 or me at (512) 972-8787.



T. H. Cloninger
Vice President,
Engineering and Technical Services

BJS/

Attachments:

1. Affidavit
2. Description of Change and Safety Evaluation
3. Determination of No Significant Hazards
4. Environmental Assessment
5. Annotated Technical Specifications and Bases
6. New Technical Requirements Manual Pages

cc:

Ellis W. Merschoff
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Thomas W. Alexion
Project Manager, Mail Code 13H3
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Cornelius F. O'Keefe
Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77404-0910

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

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

J. C. Lanier/A. Ramirez
City of Austin Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Jon C. Wood
Matthews & Branscomb
One Alamo Center
106 S. St. Mary's Street, Suite 700
San Antonio, TX 78205-3692

Institute of Nuclear Power Operations
Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

D. G. Tees/R. L. Balcom
Houston Lighting & Power Co.
P.O. Box 1700
Houston, TX 77251

Central Power and Light Company
Attention: G. E. Vaughn/C. A. Johnson
P. O. Box 289, Mail Code: N5012
Wadsworth, TX 77483

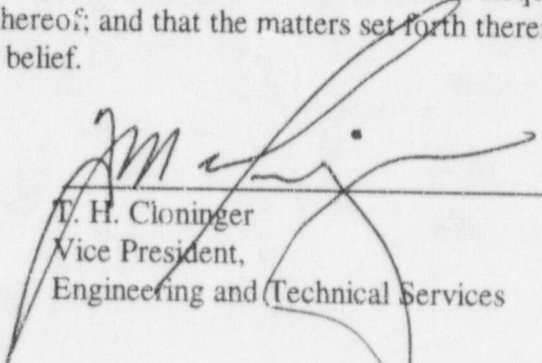
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)	
)	
South Texas Project, et al.,)	Docket Nos. STN 50-498
)	STN 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, Engineering and Technical Services of STP Nuclear Operating Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed relocation Specification 3/4.3.4, "Turbine Overspeed Protection" to the Technical Requirements Manual.; 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,
Engineering and Technical Services

STATE OF TEXAS)
)
 COUNTY OF *Matagorda*)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 28th day of October, 1998.



Linda Rittenberry
 Notary Public in and for the
 State of Texas

Description of Change:

The proposed change will relocate specification 3/4.3.4, "Turbine Overspeed Protection," to the South Texas Project (STP) Technical Requirements Manual (TRM). The associated Bases are also relocated to the TRM to be consistent with the relocation of the specification. This relocated Technical Specification is now found on the TRM pages shown in Attachment 6.

Any changes to the TRM will require a 10CFR50.59 evaluation. The 10CFR50.59 evaluation will ensure that changes to this requirement will not have any adverse impact on the safe operation of the plant. The proposed changes are consistent with NUREG-1431.

The proposed change is included in the STP application for Improved Technical Specifications (ITS). However, implementation of the ITS has been deferred. Performance of testing is required throughout the year. The planned changes will reduce the administrative burden associated with performing the required tests. Approval of the proposed relocation will facilitate future surveillance activities at the facility.

Safety Evaluation:

The turbine overspeed protection specification is provided to ensure that the turbine overspeed protection instrumentation and the turbine speed control valves are OPERABLE. This protects the turbine from excessive overspeed that could potentially result in the generation of missiles. The probability of turbine missile damage is acceptably low. The turbine overspeed instruments do not perform any functions to minimize the effects of the transient. The loss of the turbine overspeed protection instrumentation was found to be a non-significant risk contributor to core damage frequency and offsite releases as summarized in WCAP-11618.

Since the STP TRM has been incorporated into the STP Updated Final Safety Analysis Report (UFSAR), any changes to the STP TRM will require a 10CFR50.59 evaluation. The 10CFR50.59 evaluation will ensure that changes to this requirement will not have any adverse impact on the safe operation of the plant. This change is consistent with NUREG-1431.

No Significant Hazards Determination:

STPNOC has evaluated the current Technical Specification 3/4.3.4, "Turbine Overspeed Protection," using the criteria in 10CFR50.36(c)(2)(ii) and determined that the descriptive details therein do not meet the requirements for incorporation in the Technical Specifications. STPNOC proposes that the descriptive details of specific pressures and flow rates for surveillance test performance testing be relocated from the current Technical Specifications to the Technical Requirements Manual.

In accordance with the criteria set forth in 10CFR50.92, the STPNOC has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change relocates the requirements of specification 3/4.3.4, "Turbine Overspeed Protection," that do not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(2)(ii). The specification is not related to any assumed initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirement to perform the testing is not altered by the proposed change. The requirements of the limiting condition for operation and surveillance testing will be relocated from the Technical Specifications to the Technical Requirements Manual, which is incorporated in the STP UFSAR and will be maintained pursuant to 10CFR50.59. In addition, the surveillance testing details are addressed in existing surveillance procedures which are also controlled by 10CFR50.59 and subject to the change control provisions imposed by plant administrative procedures, which endorse applicable regulations and standards. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change relocates the requirements of specification 3/4.3.4, "Turbine Overspeed Protection," that do not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(2)(ii). The change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or make changes in the methods governing normal plant operation. The change will not impose different requirements, and adequate control of information will be maintained. This change will not alter assumptions made in the safety analysis and licensing basis. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The proposed change relocates the requirements of specification 3/4.3.4, "Turbine Overspeed Protection," that do not meet the 10CFR50.36 criteria for inclusion in Technical Specifications. The change will not reduce a margin of safety since it has no impact on any safety analysis assumptions. In addition, the relocated requirements applicable to the turbine overspeed protection remain the same as the existing Technical Specification requirements. Since any future changes to these requirements or the surveillance procedures will be evaluated per the requirements of 10CFR50.59, there will be no reduction in a margin of safety.

The proposed change is also consistent with the Westinghouse Plants Standard Technical Specification, NUREG-1431 approved by the NRC Staff. Revising the Technical Specifications to reflect the approved content, ensures no significant reduction in the margin of safety. Therefore, the change does not involve a significant reduction in the margin of safety.

ENVIRONMENTAL ASSESSMENT

This proposed Technical Specification Change has been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10CFR51.22 (c) (9). The following is a discussion of how the proposed Technical Specification Change meets the criteria for categorical exclusion.

10CFR51.22 (c) (9): Although the proposed change involves changes to requirements with respect to surveillance requirements;

- (i) the proposed change involves no Significant Hazards Consideration (refer to the No Significant Hazards Consideration section of this Technical Specification Change Request),
- (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite since the proposed changes do not affect the generation of any radioactive effluents nor do they affect any of the permitted release paths, and
- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22 (c)(9). Based on the aforementioned and pursuant to 10CFR51.22 (b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the proposed changes of this request.

Annotated Technical Specification Pages Enclosed

vi

xiii

3/4 3-84

B 3/4 3-6