

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

October 29, 1998  
NOC-AE-000262  
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 Snubber Technical Specifications 3/4.7.9  
to the Technical Requirements Manual

STP Nuclear Operating Company (STPNOC) proposes to relocate the Technical Specification 3/4.7.9 requirements for Snubbers to the Technical Requirements Manual.

South Texas 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 marked-up affected pages of the Technical Specifications, and new Technical Requirements Manual pages are included as attachments to this letter.

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

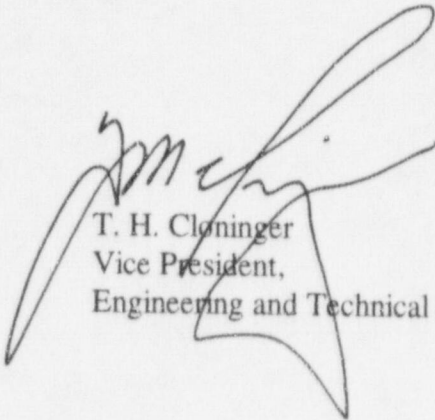
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Although STPNOC acknowledges that this proposed amendment is not a Priority I request, STPNOC still desires that this proposed amendment be reviewed and approved by the first quarter of 1999 to allow for expeditious implementation of the change. South 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 myself 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 Consideration
4. Environmental Assessment
5. Annotated Technical Specifications and Bases
6. New Technical Requirements Manual Pages

cc:

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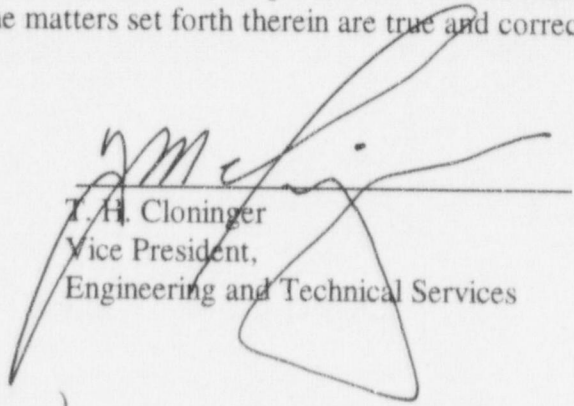
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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 of Technical Specification 3/4.7.9 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 *28<sup>th</sup>* day of *October*, 1998.



*Linda Rittenberry*  
 \_\_\_\_\_  
 Notary Public in and for the  
 State of Texas

### **Description of Change:**

The proposed change will relocate CTS 3/4.7.9, "Snubbers," and its associated Bases to the South Texas Project (STP) Technical Requirements Manual (TRM). The first effected Technical Specification page for the relocated specification is annotated "NOT USED" and the subsequent pages, including those for relocated Table 4.7-2 and Figure 4.7-1 are annotated "Page Intentionally Blank". The INDEX, page ix is annotated to show the removal of the specification. The Bases for the specification is removed, the Bases number is annotated "NOT USED," and page B 3/4.7-5 is annotated "Page Intentionally Blank." These relocated Technical Specifications are now found on new TRM pages shown in Attachment 6.

Snubbers are required to ensure that the structural integrity of safety-related systems is maintained during events that initiate dynamic loads (including seismic events). Any changes to 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.

The proposed change is included in the STP application for Improved Technical Specifications (ITS). However, implementation of the STP ITS has been deferred. Approval of the proposed change will provide administrative relief related to the implementation of snubber testing during the conduct of future test activities at the facility.

### **Safety Evaluation:**

The specification that is being proposed for relocation requires snubber testing and operability to assure that the structural integrity of safety-related systems is maintained during events that initiate dynamic loads (including seismic events). The snubber testing meets none of the criteria of 10CFR50.36(c)(2)(ii) for information or requirements to be included in the Technical Specifications. In addition, snubber operability is adequately addressed through the requirement for system operability as defined in the individual specifications applicable to systems that include snubbers in the design of their supports.

Based on the evaluation above, it is appropriate to relocate the requirements for snubber operability to the TRM. 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 Specifications for the snubber operability using the criteria in 10CFR50.36(c)(2)(ii) and determined that they do not meet the requirements for incorporation in the Technical Specifications. STPNOC proposes that the requirements applicable to Snubbers be relocated from the current Technical Specifications to the Technical Requirements Manual.

In accordance with the criteria set forth in 10CFR50.92, the South Texas Project 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 requirements and surveillances for Technical Specification 3/4.7.9 that do not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(2)(ii). The affected components are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and surveillances for these affected systems and components 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 Snubber operability is 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. The associated changes to the Index are administrative. 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 requirements and surveillances applicable to snubbers which does 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. The associated changes to the Index are administrative. 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 requirements and surveillances for snubbers, that do not meet the 10CFR50.36(c)(2)(ii) 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 and surveillances for the affected structure, system, component, or variable remain the same as the existing Technical Specifications. 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 associated changes to the Index are administrative and have no potential effect on the 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 inspection or 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.