

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

October 29, 1998
NOC-AE-000261
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 Portions of Technical Specifications Surveillance Requirement
for Diesel Generator Fuel Oil Storage Tank to the Technical Requirements Manual

STP Nuclear Operating Company (STPNOC) proposes to relocate descriptive details of Surveillance Requirement 4.8.1.1.2.g, regarding maintenance of the diesel generator fuel oil storage tank, 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.

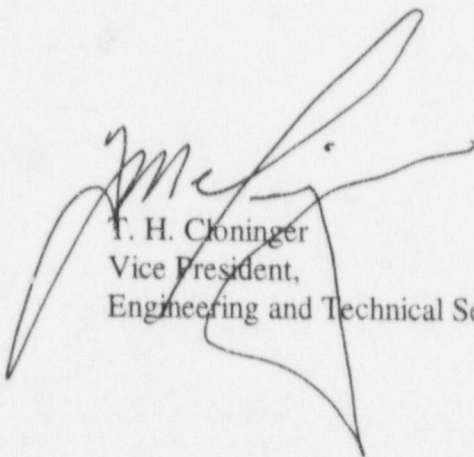
The required affidavit, a Safety Evaluation, the Determination of No Significant Hazards Consideration, the Environmental Assessment, the marked-up affected page of the Technical Specifications, and the Technical Requirements Manual pages are included as attachments to this letter.

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.

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 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 Consideration
4. Environmental Assessment
5. Annotated Technical Specifications
6. Technical Requirements Manual Pages

cc:

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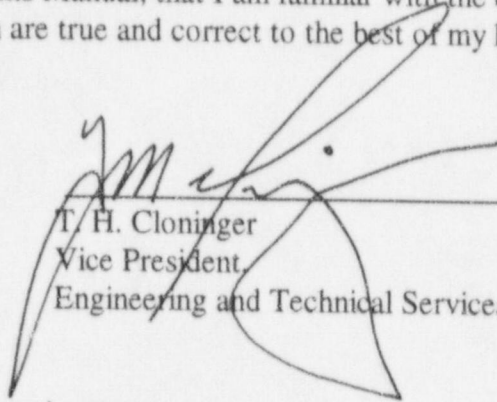
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Attention: Document Control Desk
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)	
)	
South Texas Project, et al.,)	Docket Nos. STN 50-498
)	STN 50-499
South Texas Project Units 1 and 2)	

AFFIDAVIT

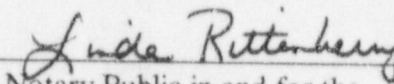
I, T. H. Cloninger, being duly sworn, hereby depose and say that I am Vice President, Engineering and Technical Services of STP Nuclear Operating Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed relocation of descriptive details regarding surveillance testing of the standby diesel generator fuel oil storage tank, 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.

Notary Public in and for the
State of Texas

Description of Change and Safety Evaluation

Description of Change:

The proposed change will relocate portions of current technical specification Surveillance Requirement 4.8.1.1.2.g regarding testing of the diesel generator fuel oil storage tanks (DGFOSTs) to the South Texas Project (STP) Technical Requirements Manual (TRM). The proposed change relocates descriptive details regarding how the tanks are to be cleaned, and information regarding the performance of the pressure test once every ten years. The associated Bases are unaffected by the proposed change. The relocated surveillance requirement is now found in the TRM pages shown in Attachment 6.

The DGFOSTs provide a storage location for fuel for the standby diesel generators. 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. Performance of tank testing is scheduled for the upcoming year. The planned changes will reduce the administrative burden associated with performing the required tests. Approval of the proposed relocation will facilitate the planned testing as well as future surveillance activities at the facility.

It should be noted that following NRC approval of this proposed technical specifications relocation to the TRM, STP intends to change (via the 10CFR50.59 evaluation process) the ten-year pressure test requirement from "110 %" to "100 %" of system design pressure, as allowed by Section III, subsection ND of the ASME Code. This test pressure change is required since the DGFOSTs are atmospheric tanks.

Safety Evaluation:

The testing details being relocated are descriptive in nature and the level of detail provided is below the threshold for inclusion in the Technical Specifications as provided in NUREG-1431. In addition, the descriptive details do not meet the criteria of 10CFR50.36(c)(3) for surveillance information or requirements to be included in the Technical Specifications. Based on the above, it is appropriate to relocate the descriptive details regarding conduct of the 10 year DGFOST surveillance test to the TRM. The requirement to perform the surveillance test is not being proposed for change, assuring that the testing will continue to be performed.

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 surveillance requirement for performing the 10 year inspection and testing of the diesel generator fuel oil storage tank using the criteria in 10CFR50.36(c)(3) and determined that the descriptive details therein do not meet the surveillance requirements for incorporation in the Technical Specifications. STPNOC proposes that the descriptive details regarding the 10 year surveillance testing of the standby diesel generator fuel oil storage tank 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 descriptive details of surveillance requirement 4.8.1.1.2.g that do not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(3). The affected descriptive testing details are 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 descriptive details of the 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 descriptive details of surveillance testing applicable to the DGFOSTs, which do not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(3). 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 descriptive details of the surveillance testing applicable to the DGFOSTs, 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 surveillance testing details for the DGFOSTs 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 is no reduction in a margin of safety.

The proposed change is also consistent with the Westinghouse Plants (Improved) Standard Technical Specification, NUREG-1431, approved by the NRC Staff. Revising the Technical Specifications to reflect the approved NUREG-1431 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 Page Enclosed

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