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

June 7, 1999
NOC-AE-000465
File No.: G20.02.01
G21.02.01
10CFR50.90

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Proposed License Amendment for Removal of the Total Allowance (TA), Sensor Error (S), and the Z Terms from the ESFAS and Reactor Trip System Instrumentation Trip Setpoints Tables

The South Texas Project proposes to amend Operating Licenses NPF-76 and NPF-80 for Units 1 and 2 with the attached changes to Technical Specification 2.2.1, "Reactor Trip System Instrumentation Setpoints" and 3.3.2, "Engineered Safety Features Actuation System Instrumentation" and the associated bases. This amendment request proposes that the Total Allowance (TA), Sensor Error (S), and Z terms be removed from the ESFAS and Reactor Trip System Instrumentation Trip Setpoints Tables.

The proposed change is included in the STP application for Improved Technical Specifications (ITS), however, implementation of the STP ITS has been deferred.

The changes included in this proposed amendment affect Technical Specification page 2-4 which is also changed in the proposed amendment for relocation of cycle-specific operating parameters from the Technical Specifications to the Core Operating Limits Report submitted June 7, 1999 (NOC-AE-000471).

The South Texas Project has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, there is no significant increase in the amounts of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. Consequently, the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment.

The affidavit, Safety Evaluation, and No Significant Hazards Consideration Determination required for the proposed change, and the proposed revised pages of the Technical Specifications and associated bases are included as attachments to this letter.

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

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

If there are any questions concerning this matter, please call either Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8787.

T. H. Cloninger
Vice President,
Generation

KAW

Attachments:
1. Affidavit
2. Safety Evaluation
3. No Significant Hazards Consideration Determination
4. Proposed Changes to Technical Specifications

cc:

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

ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)		
	)		
STP Nuclear Operating	)	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, Generation, of STP Nuclear Operating Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed operating license amendment; 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,
Generation

STATE OF TEXAS)
)
COUNTY OF MATAGORDA)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 7th day of June, 1999.

LINDA RITTENBERRY
Notary Public, State of Texas
My Commission Expires
OCT. 9, 2001

Linda Rittenberry
Notary Public in and for the
State of Texas

ATTACHMENT 2

SAFETY EVALUATION

SAFETY EVALUATION

SUMMARY

South Texas Project Technical Specification The South Texas Project proposes to revise Technical Specifications 2.2.1, "Reactor Trip System Instrumentation Setpoints" and 3.3.2, "Engineered Safety Features Actuation System Instrumentation" and the associated bases. This amendment request proposes that the Total Allowance (TA), Sensor Error (S), and the Z terms be removed from the ESFAS and Reactor Trip System Instrumentation Trip Setpoints Tables to eliminate the five-column methodology, and transition to a two-column methodology which includes only the Nominal Trip Setpoint and the Allowable Value columns.

Westinghouse originally introduced the five-column methodology for V.C. Summer. This five-column methodology contains, in addition to the Nominal Trip Setpoint and Allowable Value, three additional parameters (TA, S, and Z). The five-column methodology was designed to reduce the number of Licensee Event Reports by allowing plants the opportunity to prove that a channel was operable, even though the Allowable Value had been exceeded. When 10 CFR 50.73 was issued, however, the filing requirements associated with a Licensee Event Report were significantly changed. A Licensee Event Report must now be filed only in cases where a unit has experienced a loss of a function, not just a single channel (except where it has been determined that a required channel was inoperable longer than its allowed outage time). As a result, the benefits of the five-column methodology have been overtaken by events.

In addition, the two-column methodology provides more plant flexibility by allowing bistables to be set equal to the Nominal Trip Setpoints. The two-column methodology sufficiently makes use of the Allowable Value for determining operability. Also, by deletion of the TA, S, and Z terms, more flexibility will be permitted when updating or revising instrumentation and its associated uncertainty calculations. Technical Specification amendments will not be required when these changes do not impact the Nominal Trip Setpoint or the Allowable Value.

The proposed change is included in the STP application for Improved Technical Specifications (ITS), however, implementation of the STP ITS has been deferred.

DESCRIPTION OF PROPOSED CHANGE

The South Texas Project proposes to revise Technical Specifications 2.2.1, "Reactor Trip System Instrumentation Setpoints" and 3.3.2, "Engineered Safety Features Actuation System Instrumentation" and the associated bases. This amendment request proposes that the Total Allowance (TA), Sensor Error (S), and Z terms be removed from the ESFAS and Reactor Trip System Instrumentation Trip Setpoints Tables to eliminate the five-column methodology, and transition to a two-column methodology which includes only the Nominal Trip Setpoint and the Allowable Value columns.

SAFETY EVALUATION

The proposed change eliminates the option to evaluate the equation 2.2-1 ($Z + R + S \leq TA$), from Technical Specifications 2.2.1 and 3.3.2, within 12 hours, when the Trip Setpoint is outside the Allowable Value limit. The equation originally established a threshold for submitting a Licensee Event Report. Determining whether a Licensee Event Report should be submitted or not is not a determination that should be made within Technical Specifications. Any time a Trip Setpoint is exceeded it will be evaluated against 10CFR50.73 to determine if a Licensee Event Report is required.

The words in Action b, that provide the option to evaluate the equation 2.2-1 of Technical Specifications 2.2.1 and 3.3.2 (and the associated TA, S, and Z values and their footnotes in Tables 2.2-1 and 3.3-4), can be deleted. These parameters were originally part of the Westinghouse Setpoint Methodology for Protection Systems. If the as-measured value of a Trip Setpoint was found to be less conservative than the Allowable Value, Action b provided 12 hours for the adjustment of the setpoint without declaring the affected channel inoperable, provided that Equation 2.2-1 was satisfied. In the current revision of 10 CFR 50.73 a Licensee Event Report is not required to be submitted for this condition, and the use of Equation 2.2-1 is no longer needed. In practice, when a nonconservative as-measured Trip Setpoint is found, the channel is declared inoperable and the setpoint is adjusted as necessary. Therefore, the parameters TA, S, and Z (and associated words in Action b) can be deleted from Technical Specifications as they are no longer required. The proposed changes are consistent with NUREG-1431 and are administrative in nature.

CONCLUSION

This amendment request proposes that the Total Allowance (TA), Sensor Error (S), and Z terms be removed from the ESFAS and Reactor Trip System Instrumentation Trip Setpoints Tables eliminating the five-column methodology, and transition to a two-column methodology which includes only the Nominal Trip Setpoint and the Allowable Value columns. This is consistent with Improved Technical Specifications.

IMPLEMENTATION

The South Texas Project requests that this amendment be approved by October 1, 1999, and that the effective date be 30 days after approval by the Nuclear Regulatory Commission

ATTACHMENT 3

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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.

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

The proposed change eliminates the option to evaluate the equation ($Z + R + S \leq TA$), within 12 hours, from Technical Specification 2.2.1, when the trip setpoint is outside the allowable value limit. The equation established a threshold for submitting a Licensee Event Report. The change does not affect the probability of an accident. The evaluation of the equation is an administrative provision and has no relevance to the initiation of any analyzed event. The consequences of an accident are not affected. The change will not alter assumptions relative to the mitigation of an accident or transient event.

The proposed amendment is a programmatic and administrative change that does not physically alter safety-related systems, nor does it affect the way in which safety-related systems perform their functions. Because the design of the facility and system operating parameters are not being changed, the proposed amendment does not involve an increase in the probability or consequences of any accident previously evaluated.

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

The proposed amendment is a programmatic and administrative change that does not physically alter safety-related systems, nor does it affect the way in which safety-related systems perform their functions. The changes in methods governing normal plant operation are consistent with current safety analysis assumptions. The proposed change eliminates the option to evaluate the equation (described above) within 12 hours, when the trip setpoint is outside the allowable limit. Because the design of the facility and system operating parameters are not being changed, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed amendment is a programmatic and administrative change that provides assurance that plant operations continue to be conducted in a safe manner. As stated above, the proposed amendment does not physically alter safety-related systems, nor does it affect the way in which safety-related systems perform their functions. The proposed change eliminates the option to evaluate the equation (described above) within 12 hours, when the trip setpoint is outside the allowable limit. The margin of safety is not affected by eliminating an administrative provision in Technical Specifications. The determination for submitting a Licensee Event Report when a trip

setpoint is outside the allowable value will be performed with the guidelines of 10CFR50.73. The safety analysis assumptions will still be maintained, thus, no question of safety exists. Because the design of the facility and system operating parameters are not being changed, the proposed amendment does not involve a significant reduction in the margin of safety.

Conclusion

Based on the information presented above, the proposed change does not involve a significant hazards consideration and will not have a significant effect on the safe operation of the plant as previously analyzed. Therefore, there is reasonable assurance that operation of the South Texas Project in accordance with the proposed revised Technical Specification will not endanger the public health and safety.