

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

November 23, 1998
NOC-AE-000335
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 and STN 50-499
Proposed Amendment to Technical Specification 3/4.7.1.1
To Relocate Table 3.7-2 Orifice Size Information to the Bases

The STP Nuclear Operating Company (STPNOC) proposes to amend the South Texas Project (STP) Operating Licenses NPF-76 and NPF-80 by incorporating the attached changes into the STP Technical Specifications. This proposed amendment relocates descriptive design information from Technical Specification 3/4.7.1.1 (Table 3.7-2), regarding orifice sizes for main steam line Code safety valves, to the Bases section for this Technical Specification. This proposed license amendment is consistent with NUREG1431.

The STPNOC has reviewed the attached proposed amendment in accordance with 10CFR50.92 and has determined that the amendment does not involve a significant hazards consideration. Additionally, it has been determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment. The STP Plant Operations Review Committee has reviewed this proposed amendment and recommended it for approval. Also, the STP Nuclear Safety Review Board has reviewed and approved this proposed amendment.

The required affidavit, along with a Safety Evaluation and No Significant Hazards Consideration Determination associated with this proposed amendment, and the marked-up Technical Specification pages are included as attachments to this letter.

The STPNOC is providing the State of Texas with a copy of this proposal in accordance with 10CFR50.91(b).

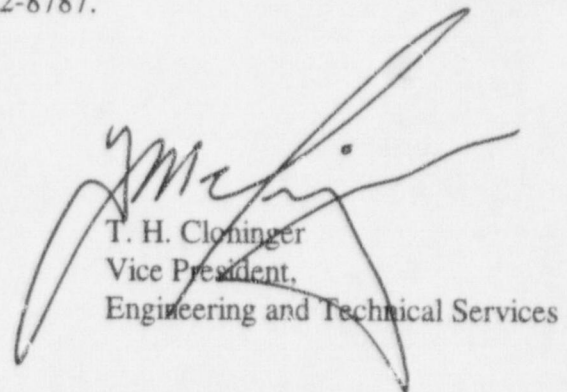
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Although the STPNOC acknowledges that this proposed amendment is not a Priority I request, the STPNOC still desires that this proposed amendment be reviewed and approved by the Nuclear Regulatory Commission (NRC) prior to the end of the second quarter of 1999 to allow for the administrative convenience of implementing the change. In addition, the STPNOC requests 30 days for implementation following NRC approval of this amendment request.

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

If there are any questions regarding this proposed amendment, please contact either Mr. A.W. Harrison at (512) 972-7298 or me at (512) 972-8787.



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

BJS

- Attachments:
1. Affidavit
 2. Technical Specification Change Description and Safety Evaluation
 3. Determination of No Significant Hazards Consideration
 4. Technical Specification Marked-Up Pages

cc:

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U. S. Nuclear Regulatory Commission
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ATTACHMENT 1

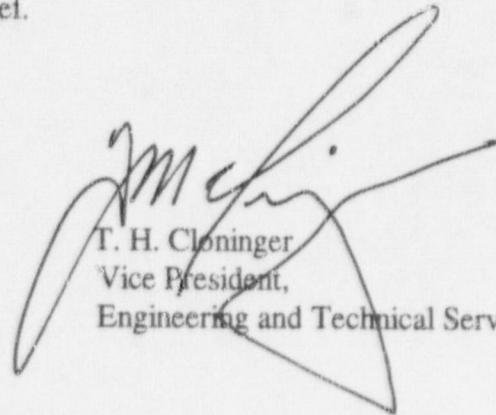
AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)	
)	
STP Nuclear Operating Company)	Docket Nos. 50-498
)	50-499
South Texas Project Units 1 & 2)	

AFFIDAVIT

I, T. H. Cloninger, being duly sworn, hereby depose and say that I am the Vice President, Engineering and Technical Services of the South Texas Project; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed amendment to the Technical Specifications involving relocation of Table 3.7-2 orifice size information to the Bases section; 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 19th day of November, 1998.



Linda Rittenberry
Notary Public in and for the
State of Texas

ATTACHMENT 2

TECHNICAL SPECIFICATION

CHANGE DESCRIPTION

AND

SAFETY EVALUATION

BACKGROUND

Table 3.7-2 of Technical Specification 3/4.7.1.1, Turbine Cycle Safety Valves, contains a column labeled "Orifice Size", which specifies the orifice size for each set of main steam line (American Society of Mechanical Engineers Boiler and Pressure Vessel) Code safety valves at the South Texas Project. The listed orifice size is the same (16 in.²) for each set of safety valves on this table. However, this orifice size information is not relevant to Technical Specification 3/4.7.1 or Table 3.7-2. The Limiting Condition for Operation for this Technical Specification (LCO 3.7.1.1) requires that the main steam line Code safety valves associated with each steam generator have the specified 'lift settings' in Table 3.7-2 to be considered operable. This is the only reference to Table 3.7-2 in this Technical Specification. There is no requirement for the orifice sizes of these valves in this Technical Specification. The listing of the orifice sizes on Table 3.7-2 only provides unnecessary descriptive design information.

DESCRIPTION OF PROPOSED CHANGES

STPNOC proposes to relocate the orifice size information specified on Table 3.7-2 to the Bases section for Technical Specification 3/4.7.1.1. This action requires:

1. Deleting the entire "Orifice Size" column from Table 3.7-2; and
2. Adding a sentence to Bases Page B 3/4 7-1 describing the orifice size information in text format.

Refer to Attachment 4 for the actual marked-up Technical Specification changes.

The proposed Technical Specification change is included in the South Texas Project application for Improved Technical Specifications (Reference 1). However, implementation of the South Texas Project Improved Technical Specifications has been deferred (Reference 2). This proposed change is consistent with NUREG-1431.

SAFETY EVALUATION

Technical Specification 3/4.7.1 provides for main steam line Code safety valves with proper lift settings to ensure that the secondary system pressure will be limited to within 110% of its design pressure during the most severe anticipated system operational transient. The orifice size information being relocated to the Bases section is descriptive design information in nature and below the threshold for inclusion into Specifications section of the Technical Specifications as provided in NUREG-1431. In addition, the orifice size design information does not meet the criteria of 10CFR50.36(c)(2)(ii) for information or requirements to be included in the Technical Specifications. Based on this reasoning, it is appropriate to relocate the descriptive design information regarding main steam line Code safety valve orifice sizes to the Bases section of the

Technical Specifications. The content of the orifice size information is not being proposed for change, thereby assuring that the information is still accurate.

The Technical Specifications Bases section requires a 10CFR50.59 evaluation for any proposed changes. The 10CFR50.59 evaluation will ensure that changes to this orifice size design information will not have any adverse impact on the safe operation of the plant. In addition, this change is consistent with NUREG-1431.

REFERENCES

1. ST-HL-AE-5390, Letter from J. F. Groth to the U.S. Nuclear Regulatory Commission dated June 4, 1996, "Proposed License Amendment to Convert the South Texas Project Technical Specifications to the Improved Standard Technical Specifications Format".
2. ST-NOC-AE-000152, Letter from Lawrence E. Martin to NRC Document Control Desk dated April 29, 1998, "Deferral of the South Texas Project Improved Technical Specifications".

ATTACHMENT 3

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

South Texas Project has evaluated this proposed amendment to relocate the main steam line Code safety valve orifice size information found on Table 3.7-2 to the Bases section for Technical Specification 3/4.7.1.1, and determined that it involves no significant hazards considerations. According to Title 10 Code of Federal Regulations Section 50 Subsection 92 Paragraph c [10 CFR 50.92(c)], a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
 2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
 3. Involve a significant reduction in a margin of safety.
1. **The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed change relocates the orifice size design information for the main steam line Code safety valves, found in Table 3.7-2, that does not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(2)(ii). The affected descriptive design information is not related to any assumed initiators of analyzed events and is not assumed to mitigate accident or transient events. The limiting condition for operation for the main steam line Code safety valves is not altered by the proposed change. The orifice size design information will be relocated from Table 3.7-2 of Specification 3/4.7.1.1 to the Bases section for that same Technical Specification and will be maintained pursuant to 10CFR50.59. In addition, surveillance testing details for this Technical Specification 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. **The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed change relocates the orifice size design information for the main steam line Code safety valves, found in Table 3.7-2, that 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. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change relocates the orifice size design information for the main steam line Code safety valves, found in Table 3.7-2, that does not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(2)(ii). The change will not reduce a margin of safety since it has no impact on any safety analysis assumptions. In addition, the relocated orifice size design information remains the same as the existing Technical Specifications. Since any future changes to this orifice size information (that will be located in the Bases section) 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 content of NUREG-1431 ensures no significant reduction in the margin of safety. Therefore, the change does not involve a significant reduction in the margin of safety.

Based on the above evaluation, STPNOC concludes that the proposed change to the Technical Specifications involves no significant hazards consideration.

ATTACHMENT 4

TECHNICAL SPECIFICATION MARKED-UP PAGES

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

The below listed Technical Specification pages are marked-up to identify the proposed changes associated with this submittal and follow this page. Listed pages numbers with "No changes" following the page number indicate that those pages contain no proposed changes, but are included for continuity of review.

Pages:

3/4 7-1 (No changes)

3/4 7-2 (No changes)

3/4 7-3

B 3/4 7-1