

50-498/499



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 1, 1998

Mr. William T. Cottle
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: UPDATE TO TECHNICAL SPECIFICATION BASES SECTION 3/4.9.10 AND
3/4.9.11, SOUTH TEXAS PROJECT (STP), UNITS 1 AND 2 (TAC NOS.
MA3763 AND MA3764)

Dear Mr. Cottle:

The purpose of the letter is to respond to South Texas Project's (STP) September 30 and November 3, 1998, letters which provided an update to Technical Specification (TS) Bases Section 3/4.9.10 and 3/4.9.11, "Water Level - Refueling Cavity and Storage Pools." The specific change removes the 10% value for clad gap iodine isotopics. The letter did not request any approval or response from the Nuclear Regulatory Commission (NRC). However, this letter is provided to confirm that NRC agrees with the proposed change.

The bases section states that the restrictions on the minimum water level is to ensure that sufficient water depth is available to remove 99% of the iodine gap activity released from the rupture of an irradiated fuel assembly. Stating the percentage of iodine present in the gap has no impact on the basis for the specification.

The amount of iodine present in the gap is captured in the accident analysis source term. This information is part of the STP Updated Final Safety Analysis Report, Chapter 15.7 4.2.2, Assumptions for the Fuel Handling Accident in the Reactor Containment Building. Based on a previous change in fuel enrichment, the gas gap consists of 10% of the fuel assembly inventory of iodides, except I-131 which is 12%.

The NRC staff agrees with the proposed change to remove the 10% value for the clad gap iodine isotopics since it does not provide a basis for this specification and the information is contained in the UFSAR where any past or future changes are controlled under 10 CFR 50.59.

Enclosed for your information, is revised TS Bases page B 3/4 9-3 that the NRC staff will use to update NRC's copy of the Bases. The revised page contains marginal lines indicating the areas

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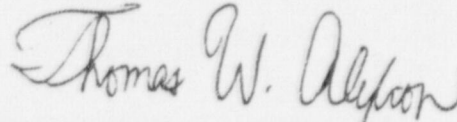
NRC FILE CENTER COPY

Mr. William T. Cottle

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of change. The corresponding overleaf page is also provided to maintain document completeness. If you have any additional questions regarding this issue, please contact me at (301) 415-1326.

Sincerely,

A handwritten signature in cursive script, reading "Thomas W. Alexion".

Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Bases Page B 3/4 9-3

cc w/encl: See next page

Mr. William T. Cottle

2

of change. The corresponding overleaf page is also provided to maintain document completeness. If you have any additional questions regarding this issue, please contact me at (301) 415-1326.

Sincerely,

ORIGINAL SIGNED BY:

Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Bases Page B 3/4 9-3

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Docket File	PUBLIC	PD4-1 r/f	TGwynn, RIV
EAdensam (EGA1)	JHannon	CHawes	MGamberoni
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OFC	PM/PD4-1	PM/PD4-1	LA/PD4-1	BC/PERB	TSB	PD/PD4-1
NAME	MGamberoni/vw	TAlexion	CHawes	Miller	WBeckner	JHannon
DATE	11/2/98	11/4/98	11/2/98	11/6/98	1/98	12/1/98
COPY	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO

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Mr. William T. Cottle
STP Nuclear Operating Company

South Texas, Units 1 & 2

cc:

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REFUELING OPERATIONS

BASES

3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that: (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and at least 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

3/4.9.9 CONTAINMENT VENTILATION ISOLATION SYSTEM

The OPERABILITY of this system ensures that the containment purge and exhaust penetrations will be automatically isolated upon detection of high radiation levels in the purge exhaust. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.10 and 3/4.9.11 WATER LEVEL - REFUELING CAVITY AND STORAGE POOLS

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed iodine gas activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL HANDLING BUILDING EXHAUST AIR SYSTEM

The limitations on the Fuel Handling Building Exhaust Air System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing. This Specification has been modified by a note that states, at least one FHB exhaust air filter train, one FHB exhaust booster fan, and one FHB main exhaust fan are capable of being powered from an Onsite emergency power source. This note ensures that required FHB exhaust train components will have an emergency power source available, even if the limiting conditions for operation can be satisfied.