

Houston Lighting & Power

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June 22, 1988 ST-HL-AE-2664 File No.: G20.02.02 10CFR50.90

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

> South Texas Project Electric Generating Station Units 1 and 2 Docket Nos. STN 50-498. STN 50-499 Proposed Revision to Technical Specifications Removal of Organization Charts from Technical Specification Administrative Control Requirements

Reference: Combined Technical Specifications for Units 1 and 2, M. A. McBurnett, HL&P; Letter to Document Control Desk, NRC; May 27, 1988, ST-HL-AE-2675.

Purs at to 10CFR50.90 and 2.101, Houston Lighting & Power Company (HL&P) hereby proposes to amend its Operating License NPF-76 by incorporating the attached proposed change into the Technical Specifications, NUREG-1305, of South Texas Project Electric Generating Station (STPEGS) Unit 1. In addition, HL&P requests that the changes be incorporated into the Combined Technical Specifications for Units 1 and 2 (Draft) submitted by Reference 1.

Specifically, the proposed change to Technical Specifications 6.2.1 and 6.2.2 deletes onsite and offsite organization charts and provides appropriate changes to the administrative control requirements. These changes have been made in accordance with the guidelines of NRC Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements." The proposed change to delete these organization charts will provide greater flexibility for implementation of changes in both the onsite and offsite organizational structure, consistent with Commission policy.

HL&P has reviewed the attached proposed change pursuant to 10CFR50.59 and 10CFR50.92 and determined that it does not constitute an unreviewed safety fool we there of 150 g question or a significant hazards consideration. The basis for this determination is provided below.

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A Subsidiary of Houston Industries Incorporated

Houston Lighting & Power Company

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The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any previously evaluated; or (3) involve a significant reduction in a margin of safety. HL&P has reviewed the proposed change and determined that:

- 1. The proposed amendment does not involve a significant increase in the probability or consequences of a accident previously evaluated because deletion of the organization charts does not affect plant operation. General requirements have been added that capture the essential aspects of the organizational structure that are defined by the organization charts to be removed.
- 2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature, and no physical alteratichs of plant configuration or changes to setpoints or operating parameters are proposed.
- 3. The proposed amendment does not involve a significant reduction in the margin of safety because of the administrative nature of the hange and the addition of general requirements that capture the essential aspects of the organizational structure that are defined by existing onsite and offsite organization charts.

Based on the above discussion, HL&P has determined that the proposed amendment does not involve a significant hazards consideration. Additionally, based on the information contained in this submittal and the NRC Final Environmental Assessment for STPEGS Units 1 and 2, HL&P has concluded that pursuant to 10CFR51, there are no significant radiological or nonradiologial impacts associated with the proposed action and the proposed licerse amendment will not have a significant effect on the quality of the human environment.

The STPEGS Unit Nuclear Safety Review Board has reviewed and approved this proposed change.

Houston Lighting & Power Company

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

Pursuant to the requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.00.

If you should have any questions on this matter, please contact Mr. M.A. McBurnett at (512) 972-8530.

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G. E. Vaughn Vice President Nuclear Plant Operations

GEV/PLW/nl

Attachment: 1) Proposed Revision to Technical Specification pages xviii, 6-1, 6-3 and 6-4

2) Check No. 00116409

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> Revised 06/16/88 NL.DIST

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power Company, et al., Docket No. 50-498

South Texas Project Unit 1

## AFFIDAVIT

G. E. Vaughn being duly sworn, hereby deposes and says that he is Vice President, Nuclear Plant Operations, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed amendment to the Technical Specification index, Section 6-2, Figure 5.2-1, and Figure 6.2-2; is familiar with the content hereof; that the matters set forth therein are true and correct to the best of his knowledge and belief.

G. E. Vaughn Vice President Nuclear Plant Operations

Subscribed and sworn to before me, a Notary Public in and for Matagorda County, Texas this <u>22 nd day</u> of <u>1988</u>.

ANN ALEXANDER Notary Public, State of Texas My Commission Expires 12-7-91

ann alexander

Notary Public in and for the State of Texas