



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 101 AND 88 TO

FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

STP NUCLEAR OPERATING COMPANY

DOCKET NOS. 50-498 AND 50-499

SOUTH TEXAS PROJECT, UNITS 1 AND 2

1.0 INTRODUCTION

By application dated October 29, 1998, STP Nuclear Operating Company, et.al., (the licensee) requested changes to the Technical Specifications (TSs) (Appendix A to Facility Operating License Nos. NPF-76 and NPF-80) for the South Texas Project, Units 1 and 2 (STP). The proposed changes would relocate TS 3/4.3.4, Turbine Overspeed Protection and its associated Bases to the STP Technical Requirements Manual.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires that applicants for nuclear power plant operation licenses state TSs and that these TSs be included as a part of the license. The Commission's regulatory requirements related to the content of TSs are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls and states also that the Commission may include additional TSs as it finds to be appropriate. However, the regulation does not specify the particular TSs to be included in a plant's license.

The Commission has provided guidance for the contents of TS limiting conditions for operation (LCO) and associated requirements in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement), 58 FR 39132 (July 22, 1993), which was codified in 10 CFR 50.36(c)(2)(ii). The four criteria to be used in determining whether a particular matter is required to be included in the TS LCO, are as follows:

(1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; or (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

### 3.0 EVALUATION

The existing TS 3/4.3.4 Conditions, Actions, and Surveillance Requirements for Turbine Overspeed Protection are relocated to the Technical Requirements Manual (TRM). The turbine overspeed protection system instrumentation is not considered to prevent or mitigate any design basis accident or transient.

Although the design basis accidents and transients include a variety of system failures and conditions which might result from turbine missiles striking various plant systems and equipment, the system failures and plant conditions could be caused by other events as well as turbine failures. In view of the low likelihood of turbine missiles, this scenario does not constitute a part of the primary success path to prevent or mitigate such design basis accidents and transients. Similarly, the turbine overspeed control is not part of an initial condition of a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The above relocated requirements relating to installed plant instrumentation are not required to be in the TSs under 10 CFR 50.36, because they do not fall within any of the four criteria discussed above and are therefore, not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. In addition, since the licensee has incorporated the TRM, by reference, into the Updated Final Safety Analysis Report, changes to the TRM would be controlled in accordance with approved station procedures and the requirements of 10 CFR 50.59. The staff, therefore, finds that sufficient regulatory controls exist. Accordingly, the staff has concluded that these requirements may be relocated from the TSs to the licensee's TRM.

In the October 29, 1998, application, the licensee provided the revised TRM pages that incorporate the LCO and surveillance requirements from TS 3/4.3.4 and the associated Bases information. The staff has reviewed the TRM change and has verified that the information from TS 3/4.3.4 has been appropriately relocated and that changes to the TRM will be controlled under 10 CFR 50.59.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located in the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The Nuclear Regulatory Commission staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (63 FR 69347). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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