

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

January 20, 1999  
NOC-AE-000264  
File No.: G20.02.01  
G21.02.01  
10CFR50.90

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Proposed Amendment to Technical Specification Surveillance Requirements for  
Auxiliary Feedwater Pump Performance Testing

STP Nuclear Operating Company (STPNOC) proposes to amend South Texas Project Operating Licenses NPF-76 and NPF-80 by incorporating the attached changes into the Technical Specifications. These proposed changes revise the descriptive details of Technical Specification Surveillance Requirement 4.7.1.2.1.a, regarding performance testing of the Auxiliary Feedwater (AFW) pumps, to more closely adhere to NUREG-1431, Improved Standard Technical Specifications for Westinghouse Plants. This revision involves relocating the surveillance-required numerical values for AFW pump performance test discharge pressure and flow rate to the South Texas Project Updated Final Safety Analysis Report (UFSAR).

STPNOC has reviewed this proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, South Texas Project has determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment. The South Texas Project Plant Operations Review Committee has reviewed, and recommended for approval, this proposed amendment. Also, the South Texas Project Nuclear Safety Review Board has reviewed and approved this proposed amendment.

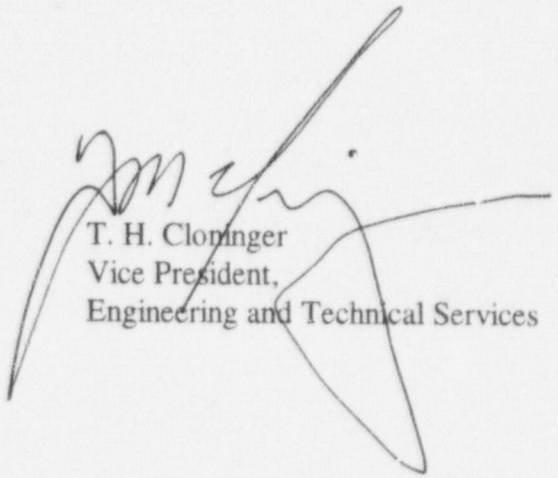
In accordance with 10CFR50.91(b), STPNOC is notifying the State of Texas of this request for license amendment by providing a copy of this letter and its attachments.

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Although STPNOC acknowledges that this proposed amendment is not a Priority I request, STPNOC still desires that this proposed amendment be reviewed and approved by September 30, 1999 to allow for expeditious implementation of the change. STPNOC also requests 30 days for implementation of the approved amendment.

STPNOC has determined that this submittal letter contains no new licensing commitments.

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



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

BJS/jrm/

Attachments:

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

cc:

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



# **ATTACHMENT 1**

## **AFFIDAVIT**

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

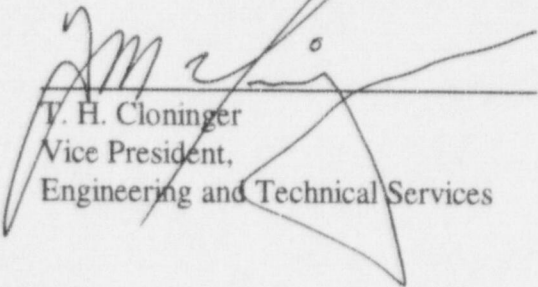
South Texas Project Nuclear )  
Operating Company, et al., )

South Texas Project Units 1 and 2 )

Docket Nos. STN 50-498  
STN 50-499

AFFIDAVIT

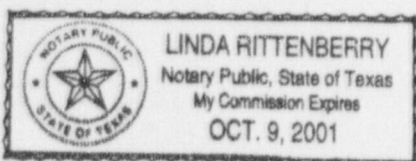
I, T. H. Cloninger, being duly sworn, hereby depose and say that I am Vice President, Engineering and Technical Services of STP Nuclear Operating Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed change regarding surveillance performance testing of the auxiliary feedwater pumps; 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.

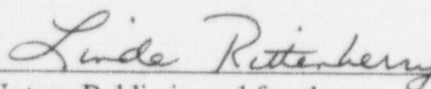
  
T. H. Cloninger  
Vice President,  
Engineering and Technical Services

STATE OF TEXAS )

COUNTY OF MATAGORDA )

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this  
20<sup>th</sup> day of January, 1999.



  
Notary Public in and for the  
State of Texas

**ATTACHMENT 2**

**TECHNICAL SPECIFICATION**

**CHANGE DESCRIPTION**

**AND**

**SAFETY EVALUATION**



## **BACKGROUND**

Each Auxiliary Feedwater (AFW) System pump is required by current Technical Specification Surveillance Requirements 4.7.1.2.1.a.1 and 4.7.1.2.1.a.2 to be flow tested monthly to verify pump performance for operability determination. These Surveillance Requirements (SRs) specify a minimum pump discharge pressure and flow rate to verify pump operability. However, the applicable SR for AFW pump performance testing specified in NUREG-1431, Improved Standard Technical Specifications for Westinghouse Plants, differs from the current South Texas Project (STP) Technical Specification SRs mentioned above in that the NUREG-1431 SR is worded without specifying numerical minimum pump discharge pressure and flow rate limits.

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 CHANGES**

The proposed changes revise the wording of SRs 4.7.1.2.1.a.1 and 4.7.1.2.1.a.2 to mimic the associated NUREG-1431 SR for AFW pump performance testing. The AFW pump surveillance test wording involving numerical minimum limits for discharge pressure and flow rate is being modified to a requirement that verifies the AFW pumps are capable of supplying the required developed head at the flow test point. The actual requirement to perform the pump test is retained in the Technical Specifications, but the required numerical minimum discharge pressure and flow rate limits have been relocated to the STP Updated Final Safety Analysis Report (UFSAR).

These proposed changes have been marked on the Technical Specification pages found in Attachment 4. The associated changed Bases pages are also included in that attachment. Approved changes to the STP UFSAR containing AFW pump minimum numerical limits for discharge pressure and flow rate are found in Attachment 5.

Since the required AFW pump surveillance test numerical minimum discharge pressure and flow rate limits are now specified in the UFSAR, any changes to these numerical limits will require a 10CFR50.59 evaluation. The 10CFR50.59 evaluation will ensure that changes to these testing requirements will not have any adverse impact on the safe operation of the plant.

## **SAFETY EVALUATION**

The AFW pump SR testing details (i.e., minimum pump discharge pressure and flow rate limits) that are being relocated to the UFSAR are descriptive in nature and the level of detail provided is below the threshold for inclusion in the Technical Specifications as provided in NUREG-1431. In addition, the descriptive details do not meet the criteria of 10CFR50.36(c)(3) for information or

requirements to be included in the Technical Specifications. The actual requirement to perform the surveillance test is not being proposed for change, assuring that the testing will continue to be performed. Based on this reasoning, it is therefore appropriate to relocate the descriptive details regarding SR AFW pump discharge pressure and flow rate surveillance test limits to the UFSAR. Changes to the UFSAR require a 10CFR50.59 evaluation. The 10CFR50.59 evaluation will ensure that changes to this requirement will not have any adverse impact on the safe operation of the plant. These changes are consistent with NUREG-1431.

Based on the above evaluation, STPNOC believes there is reasonable justification to request the proposed Technical Specifications contained within.

### **IMPLEMENTATION**

Although STPNOC acknowledges that this proposed amendment to the Technical Specifications is not a Priority I request, STPNOC still desires that this proposed amendment be reviewed and approved by the Nuclear Regulatory Commission (NRC) no later than September 30, 1999 to allow for expeditious implementation of the proposed changes. This proposed amendment is applicable to both South Texas Project units. STPNOC also requests 30 days for implementation of this proposed amendment.

### **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**

STPNOC has evaluated this proposed amendment, 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.

## **INTRODUCTION**

STPNOC proposes to revise Technical Specification SRs 4.7.1.2.1.a.1 and 4.7.1.2.1.a.2 for performance testing of the AFW pumps by relocating the pump numerical limits for discharge pressure and flow rate to the UFSAR. The requirement to perform the pump performance testing will not be changed and will remain in the Technical Specifications. This change is requested since the testing details proposed to be relocated are descriptive in nature and the level of detail provided is below the threshold for inclusion in the Technical Specifications as provided in NUREG-1431. In addition, the descriptive details do not meet the criteria of 10CFR50.36(c)(3) for surveillance information or requirements to be included in the Technical Specifications.

In accordance with the criteria set forth in 10CFR50.92, the STPNOC has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

## **NO SIGNIFICANT HAZARDS ANALYSIS**

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

The proposed change, which relocates descriptive details (i.e., numerical values for AFW pump discharge pressure and flow rate) of the surveillance testing applicable to the AFW pumps, does not involve a significant increase in the probability or consequences of an

accident previously evaluated. The affected AFW pump testing pressure and flow descriptive details that are being removed from SRs 4.7.1.2.1.a.1 and 4.7.1.2.1.a.2 are not related to any assumed initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirement to perform testing on a monthly, staggered basis is not altered by the proposed change, and will remain in the Technical Specifications. The descriptive details of the surveillance testing will be relocated from the Technical Specifications to the UFSAR and will be maintained pursuant to 10CFR50.59. The proposed revised wording of SRs 4.7.1.2.1.a.1 and 4.7.1.2.1.a.2 (i.e., to verify the developed head of each pump is greater than or equal to the required developed head) and the relocation of pump testing details to the UFSAR is consistent with the AFW pump test requirements in NUREG-1431. In addition, the surveillance testing details are addressed in existing surveillance procedures that 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, this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

The proposed change relocates descriptive details (i.e., numerical values for AFW pump discharge pressure and flow rate) of surveillance testing applicable to the AFW pumps, which do not meet the criteria for inclusion in Technical Specifications as identified in 10CFR50.36(c)(3). The requirement to perform testing on a monthly, staggered basis is not altered by the proposed change, and will remain in the Technical Specifications. Additionally, relocation of the descriptive testing details is consistent with the wording of the AFW pump test requirements in NUREG-1431, which does not specify minimum numerical pressure and flow limits. The proposed 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 any future changes to these relocated surveillance testing details or to the applicable surveillance procedures will be evaluated per the requirements of 10CFR50.59. This change will not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

**3. Does this change involve a significant reduction in a margin of safety?**

The proposed change, which relocates descriptive details (i.e., numerical values for AFW pump discharge pressure and flow rate) of the surveillance testing applicable to the AFW



pumps, will not reduce a margin of safety since it has no impact on any safety analysis assumptions. The requirement to perform AFW pump testing on a monthly, staggered basis will not be altered by the proposed change, and will remain in the Technical Specifications. Furthermore, the proposed change will not affect the operability requirements of the AFW system as delineated in Specification 3.7.1.2. Since any future changes to these relocated surveillance testing details or to the applicable surveillance procedures will be evaluated per the requirements of 10CFR50.59, there is no reduction in a margin of safety. Finally, this proposed change is also consistent with NUREG-1431, previously approved by the NRC Staff. Revising the Technical Specifications to reflect the approved NUREG-1431 content ensures no significant reduction in the margin of safety. Therefore, this proposed change does not involve a significant reduction in the margin of safety.

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