

The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

November 12, 1987
ST-HL-AE-2413
File No.: G20.02.01
10CFR50.90

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

South Texas Project Electric Generating Station
Unit 1

Docket No. STN 50-498

Proposed Revision to Technical Specifications 3.0.4, 4.0.3 and
4.0.4 in Accordance with Generic Letter 87-09

Pursuant to 10CFR50.90 and 2.101, Houston Lighting & Power (HL&P) hereby proposes to amend its Operating License NPF-71 by incorporating the attached proposed change into the Technical Specifications, NUREG-1255, of South Texas Unit 1. We would appreciate your timely review of the proposed change.

Specifically, the proposed change to Technical Specifications 3.0.4, 4.0.3 and 4.0.4 are being provided in accordance with Generic Letter 87-09.

DISCUSSION

These changes address three problems with the present Standard Technical Specifications (STS) Sections 3.0.4, 4.0.3 and 4.0.4. The first problem involves unnecessary restrictions on mode changes by Specification 3.0.4 and inconsistent application of exceptions to it. The second problem involves unnecessary shutdowns caused by Specification 4.0.3 when surveillance intervals are inadvertently exceeded. It is extremely conservative to assume that systems or components are inoperable when a surveillance has not been performed because the majority of surveillances do, in fact, demonstrate that systems or components are operable. The Staff has concluded that 24 hours is an acceptable time limit for completing a missed surveillance when the allowable outage times of the ACTION Requirements are less than this limit, or when time is needed to obtain a temporary waiver of the Surveillance Requirement. The third problem involves conflicts in Specification 4.0.3 which prohibit entry into an operational mode or other specified condition when Surveillance Requirements have not been performed within the specified surveillance interval. A conflict with this requirement exists when a mode change is required as a consequence of ACTION Requirements and when

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the Surveillance Requirements that become applicable have not been performed within the specified surveillance interval. Specification 4.0.4 has been clarified to allow passage through or to operational modes as required to comply with ACTION Requirements.

SIGNIFICANT HAZARDS CONSIDERATION

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 accident 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 an accident previously evaluated because it is extremely conservative to assume that systems or components are inoperable when a surveillance has not been performed because the majority of surveillances do, in fact, demonstrate that systems or components are operable. Furthermore, the Staff has concluded in Generic Letter 87-09 that 24 hours is an acceptable time limit for completing a missed Surveillance when the allowable outage times of the ACTION Requirements are less than this limit or when time is needed to obtain a temporary waiver of the Surveillance Requirement.
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because again, the majority of surveillances do, in fact demonstrate that systems or components are operable. Additionally, entry into an OPERATIONAL MODE or specified condition made in accordance with ACTION Requirements which permit continued operation of the facility for an unlimited period of time resolves the problem of inconsistent application of exceptions to Specification 3.0.4, which ultimately delay startup and return to power operation when the facility is required to be in a lower mode of operation as a consequence of other Action Requirements.

3. The proposed amendment does not involve a significant reduction in the margin of safety. The proposed changes to the Technical Specification Bases clearly establish the intent of the revised Specifications 3.0.4, 4.0.3 and 4.0.4 and continue to ensure that conformance to the Limiting Conditions for Operation, ACTION Requirements and Surveillance Requirements provide an acceptable level of safety for continued operation of the plant.

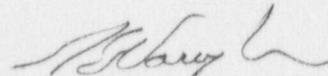
Based on the above discussion, HL&P has determined that the proposed amendment does not involve a significant hazards consideration. Additionally, based upon the information contained in this submittal and the NRC Final Environmental Assessment for South Texas Units 1 & 2, HL&P has concluded that pursuant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

The South Texas Unit 1 Nuclear Safety Review Board has reviewed and approved these attached proposed changes.

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 Ms. F. A. White at (512) 972-7985.



G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/FAW/yfw

- Attachment: 1) Proposed Revision to Technical Specification 3.0.4, 4.0.3, 4.0.4 and associated Bases.
- 2) Check No: 080030

cc:

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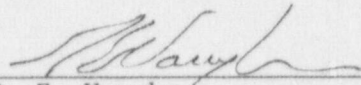
Revised 11/10/87

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)	
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Houston Lighting & Power)	Docket Nos. 50-498
Company, et al.,)	50-499
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South Texas Project)	
Units 1 and 2)	

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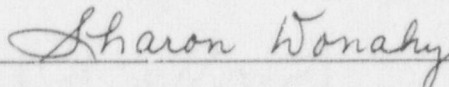
G. E. Vaughn being duly sworn, hereby deposes and says that he is Vice President, Nuclear Plant Operations, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed Technical Specifications amendment to Sections 3.0.4, 4.0.3 and 4.0.4 and is familiar with the content thereof; 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

STATE OF TEXAS)
)
COUNTY OF MATAGORDA)

Subscribed and sworn to before me, a Notary Public in and for Matagorda County, Texas this 12th day of November, 1987.



Notary Public in and for the
State of Texas

My commission expires:

April 6, 1991

