



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

April 15, 2021  
NOC-AE-21003799  
File No.: Z18  
10 CFR 50.4(b)(5)  
10 CFR 50.54(q)(5)  
10 CFR 72.4  
10 CFR 72.44(f)  
STI: 35155311

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498; STN 50-499; 72-1041  
Changes to South Texas Project Electric Generating Station (STPEGS) Emergency Plan

In accordance with 10 CFR 50.4(b)(5), 10 CFR 50.54(q)(5), 10 CFR 72.4, and 10 CFR 72.44(f), STP Nuclear Operating Company (STPNOC) hereby submits the attached change to the Emergency Plan. The change, which revises the STPEGS Emergency Action Level Technical Bases Document, became effective March 18, 2021.

STPNOC has evaluated this change in accordance with 10 CFR 50.54(q) and determined that the change does not represent a reduction in the effectiveness of the Emergency Plan and that the plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. A complete description of changes and a 10 CFR 50.54(q)(5) summary for the change is attached.

There are no commitments contained within this letter.

If there are any questions regarding this matter, please contact Tim Hammons at (361) 972-7347 or me at (361) 972-8767.

Joseph D. Enoch  
Manager, Emergency Response

tjh

Attachment: Description of Changes and Summary of Analysis for Change to STPEGS EAL Technical Bases Document in Revision 3

cc:

Director, Division of Fuel Management  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

## Description of Changes and Summary of Analysis for Change to STPEGS EAL Technical Bases Document in Revision 3

### 1. Description of Change

Changes were made to remove the term “downgrading” and replace with “termination.” This change is considered a non-intent, non-technical change to better align with site specific processes and procedures.

Changes were made to Emergency Action Level (EAL) SU3.

The revised EAL-2 reads:

Sample analysis indicates that a reactor coolant activity value is greater than an allowable limit specified in Technical Specifications.

- Greater than 1 $\mu$ Ci/gm Dose Equivalent I-131  
OR
- Greater than 540  $\mu$ Ci/gm Dose Equivalent Xe-133

A corresponding change is being made to the SU3 EAL-2 Selection Basis.

The accompanying table displays the original text, the modified text, and the justification for each change.

### 2. 10 CFR 50.54(q) Summary of Analysis Evaluation for Change

The change made to remove the term “downgrading” and replace with “termination” is considered a non-intent, non-technical change to better align with site specific processes and procedures. The proposed change is not an entire scheme change. The technical basis of the NRC approved Emergency Classification EAL scheme has not been altered. The option to downgrade an emergency classification is not a specific component of the Emergency Plan and is not required by regulation. Current processes and procedures provide for exiting a declared emergency via termination or entry into recovery as conditions require. The downgrading of an emergency classification level, once the emergency plan has been activated, provides no additional benefit or protection to the public. This change ensures the termination process is used instead of the downgrade option. The substitution of the “termination” process in place of the “downgrade” option does not result in a reduction in effectiveness.

The changes made to EAL SU3 do alter the methodology for implementation of the Emergency Classification EAL scheme. This revision was to update an EAL numeric threshold to reflect an approved change in a Technical Specification. The change continues to comply with guidance and methodologies in NEI 99-01, Revision 6.

Specifically, the changes:

- Do not reduce the effectiveness of the emergency plan or its implementing procedures.
- Do not reduce the capability to perform an emergency planning function.
- Continue to comply with 10 CFR Part 50.47, Emergency plans, section (b) standards.

- Continue to comply with Appendix E to 10 CFR Part 50, Emergency Planning and Preparedness for Production and Utilization Facilities requirements.
- Continue to meet the elements in NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

### 3. **Change**

The following table displays the original text, the modified text, and the justification for the change.

No.	Type	Existing Revision 2 Effective Date – June 2020	As Modified Revision 3	Justification
1	CHANGE	Table of Contents: 5.6 EMERGENCY CLASSIFICATION LEVEL UPGRADING AND DOWNGRADING	Table of Contents: 5.6 EMERGENCY CLASSIFICATION LEVEL UPGRADING AND TERMINATION	Editorial change corresponding to the removal of the downgrade option as described in items below.
2	CHANGE	Revision Summary Clarified EAL Bases with plant & equipment conditions/status that warrant declaration of the Unusual Event. Affected ECL CU4.	Revision Summary 1. Deleted the option for downgrading an Emergency Classification Level. 2. Changed EAL SU3, EAL-2 to conform to the new Technical Specification for Reactor Coolant System specific activity as granted by Tech Spec 3/4.4.8 change LAR in AE-NOC-20003282.	Deletion of previous revision summary and insertion of current revision summary.
3	CHANGE	Page 13, Step 4.2, “Critical Characteristics” The scheme facilitates upgrading and downgrading of the emergency classification where necessary.	Page 13, Step 4.2, “Critical Characteristics” The scheme facilitates upgrading and termination of the emergency classification where necessary.	The option to downgrade an emergency classification is not a specific component of the Emergency Plan and is not required by regulation. Current processes and procedures provide for exiting a declared emergency plan implementation via termination or entry into recovery as conditions require. The downgrading of an emergency classification level, once the emergency plan has been activated, provides no additional benefit or protection to the public. This change ensures the termination process is exchanged for the downgrade option. The removal of the downgrade option does not result in a reduction in effectiveness.

No.	Type	Existing Revision 2 Effective Date – June 2020	As Modified Revision 3	Justification
4	CHANGE	<p>Page 16: 5.6 EMERGENCY CLASSIFICATION LEVEL UPGRADING AND DOWNGRADING</p> <p>An ECL may be downgraded when the event or condition that meets the highest IC and EAL no longer exists, and other site-specific downgrading requirements are met. If downgrading the ECL is deemed appropriate, the new ECL would then be based on a lower applicable IC(s) and EAL(s). The ECL may also simply be terminated.</p> <p>The following approach to downgrading or terminating an ECL is recommended.</p>	<p>Page 16: 5.6 EMERGENCY CLASSIFICATION LEVEL UPGRADING AND TERMINATION</p> <p>When the event or condition that meets an IC and EAL no longer exists, and other site-specific requirements are met, the ECL may be terminated.</p> <p>The following approach to terminating an ECL is recommended.</p>	See justification, change #3
5	CHANGE	<p>Page 16 Table under 5.6: ALERT - Downgrade or terminate the emergency in accordance with plant procedures.</p> <p>SITE AREA EMERGENCY with no long-term plant damage - Downgrade or terminate the emergency in accordance with plant procedures.</p>	<p>Page 16, Table under 5.6: ALERT - Terminate the emergency in accordance with plant procedures.</p> <p>SITE AREA EMERGENCY with no long-term plant damage - Terminate the emergency in accordance with plant procedures.</p>	See justification, change #3
6	CHANGE	<p>Page 116, SU3: Greater than 100/ Ē bar μCi /gm gross activity</p>	<p>Page 116, SU3: Greater than 540 μCi/gm Dose Equivalent Xe-133</p>	The change in is being made to conform to the new Technical Specification for Reactor Coolant System specific activity as granted by Tech Spec 3.4.8 change LAR in AE-NOC-20003282.
7	CHANGE	<p>Page 116, SU3, EAL-2 Selection Basis: 100/ Ē bar μCi /gm gross activity</p>	<p>Page 116, SU3, EAL-2 Selection Basis: 540 μCi/gm Dose Equivalent Xe-133</p>	See justification, change #6

<b>No.</b>	<b>Type</b>	<b>Existing Revision 2 Effective Date – June 2020</b>	<b>As Modified Revision 3</b>	<b>Justification</b>
8	CHANGE	Footer contents from Revision 2: Rev 2	Footer contents from Revision 3: Rev 3	Editorial Changes to reflect new revision data. Includes all existing footers for all pages.