



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

September 1, 2022
NOC-AE-22003913
10 CFR 50.90
STI: 35356816

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

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Supplement to Application to Revise Technical Specifications to Adopt
TSTF-554, "Revise Reactor Coolant Leakage Requirements" (EPID: L-2021-LLR-0075)

References:

1. Letter from K. Harshaw to Document Control Desk; "South Texas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Application to Revise Technical Specifications to Adopt TSTF-554, "Revise Reactor Coolant Leakage Requirements;" August 9, 2022; NOC-AE-22003908; ML22221A212.
2. Email from D. Galvin, NRC to W. Brost, STPNOC; "Errors in STP TSTF-554 LAR TS Page Markups;" August 23, 2022; AE-NOC-22003346.

In response to Reference 2, STP Nuclear Operating Company (STPNOC) submits this supplement to correct errors identified in Reference 1. These changes do not alter the technical content of the license amendment request.

- In the previous submittal Technical Specification page 1-3 did not have Amendments 220 and 205 incorporated and was submitted in error. The corrected page with Amendments 220 and 205 has been incorporated in the enclosure.
- In the previous submittal Technical Specification page 1-4 text did not exactly match the authority file of the South Texas Project Technical Specifications. Specifically, Item 1.18 was identified as "MEMBER OF THE PUBLIC" instead of "MEMBER(S) OF THE PUBLIC". The corrected page is incorporated in the enclosure.

This letter contains no new regulatory commitments.

Should you have any questions regarding this submission, please contact Zachary Dibbern at (361) 972-4336 or me at (361) 972-4778.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

9/1/2022

Kimberly Harshaw
Executive VP and CNO

Attachments:

1. Corrected Proposed Technical Specification Changes (Markup)
2. Corrected Revised Technical Specification Pages

cc:

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Resident Inspector, South Texas Project
U.S. Nuclear Regulatory Commission

Attachment 1

Corrected Proposed Technical Specification Changes (Markup)

DEFINITIONS

DOSE EQUIVALENT XE-133

1.12 DOSE EQUIVALENT XE-133 shall be the concentration of Xe-133 (microcuries per gram) that alone would produce the same acute dose to the whole body as the combined activities of noble gas nuclides Kr-85m, Kr-85, Kr-87, Kr-88, Xe-131m, Xe-133m, Xe-133, Xe-135m, Xe-135, and Xe-138 actually present. If a specific noble gas nuclide is not detected, it should be assumed to be present at the minimum detectable activity. The determination of DOSE EQUIVALENT XE-133 shall be performed using effective dose conversion factors for air submersion listed in Table III.1 of EPA Federal Guidance Report No. 12, 1993, "External Exposure to Radionuclides in Air, Water, and Soil."

ENGINEERED SAFETY FEATURES RESPONSE TIME

1.13 The ENGINEERED SAFETY FEATURES (ESF) RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF Actuation Setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.

FREQUENCY NOTATION

1.14 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

GASEOUS WASTE PROCESING SYSTEM

1.15 A GASEOUS WASTE PROCESSING SYSTEM shall be any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System offgases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

IDENTIFIED LEAKAGE

1.16 IDENTIFIED LEAKAGE shall be:

- a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known ~~either to not to~~ interfere with the operation of Leakage Detection Systems ~~or not to be~~ PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor Coolant System leakage through a steam generator to the Secondary Coolant System.

DEFINITIONS

MASTER RELAY TEST

1.17 A MASTER RELAY TEST shall be the energization of each master relay and verification of OPERABILITY of each relay. The MASTER RELAY TEST shall include a continuity check of each associated slave relay.

MEMBER(S) OF THE PUBLIC

1.18 MEMBER(S) OF THE PUBLIC means an individual in a controlled area or UNRESTRICTED AREA. However, an individual is not a member of the public during any period in which the individual receives an occupational dose.

1.19 Not Used

OPERABLE - OPERABILITY

1.20 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.21 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2.

PHYSICS TESTS

1.22 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation: (1) described in Chapter 14.0 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.23 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a ~~nonisolable~~ fault in a Reactor Coolant System component body, pipe wall, or vessel wall. **Leakage past seals, packing, and gaskets is not PRESSURE BOUNDARY LEAKAGE.**

REACTOR COOLANT SYSTEM

OPERATIONAL LEAKAGE

LIMITING CONDITION FOR OPERATION

3.4.6.2 Reactor Coolant System operational leakage shall be limited to:

- a. No PRESSURE BOUNDARY LEAKAGE,
- b. 1 gpm UNIDENTIFIED LEAKAGE,
- c. 150 gallons per day of primary-to-secondary leakage through any one steam generator,
- d. 10 gpm IDENTIFIED LEAKAGE from the Reactor Coolant System, and
- e. 0.5 gpm leakage per nominal inch of valve size up to a maximum of 5 gpm at a Reactor Coolant System pressure of 2235 ± 20 psig from any Reactor Coolant System Pressure Isolation Valve specified in Table 3.4-1.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With any PRESSURE BOUNDARY LEAKAGE, isolate the affected component, pipe, or vessel from the RCS by use of a close manual valve, closed and de-activated automatic valve, blind flange, or check valve within 4 hours or ~~or with primary-to-secondary leakage not within limit,~~ be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With Reactor Coolant System operational UNIDENTIFIED or IDENTIFIED LEAKAGE greater than the above limits, reduce leakage to within limits within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With primary-to-secondary leakage not within the limit, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.
- ed. With any Reactor Coolant System Pressure Isolation Valve leakage greater than the above limit, isolate the high pressure portion of the affected system from the low pressure portion within 4 hours by use of at least two closed manual or deactivated automatic valves, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

*Test pressures less than 2235 psig but greater than 150 psig are allowed. Observed leakage shall be adjusted for the actual test pressure up to 2235 psig assuming the leakage to be directly proportional to pressure differential to the one-half power.

Attachment 2
Corrected Revised Technical Specification

DEFINITIONS

DOSE EQUIVALENT XE-133

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