



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001
August 26, 1999

Mr. William T. Cottle
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 (STP) - PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE ON REPLACEMENT STEAM GENERATOR (SG) WATER LEVEL TRIP SETPOINT (TAC NOS. MA2500 AND MA2501)

Dear Mr. Cottle:

On July 22, 1999, the NRC met with representatives from STP Nuclear Operating Company (STPNOC) to discuss STPNOC's July 22, 1998 (as supplemented by letter dated June 16, 1999), proposed TS change for the replacement SG water level low-low trip setpoint. At STP, as well as at other Westinghouse-designed pressurized water reactors, the pressurizer programmed water level at full power operation is used as the plant's initial condition assumed in its safety analyses for transients and accidents sensitive to the pressurizer water level. The revised analyses that support the proposed SG TS change also require a revision to the assumption of the initial condition regarding the pressurizer water level to prevent the pressurizer from going solid during the transients that were analyzed. However, neither the current or the revised pressurizer water level assumptions are supported by STP's existing or proposed TSs. Therefore, the meeting focused on whether STPNOC should propose revised TSs to support the revised pressurizer water level assumption used in the new analysis which is used to support the proposed SG TS change.

The NRC has reviewed STPNOC's views expressed at the meeting, which include the position that the NRC should review the subject SG TS without requiring a TS to support the pressurizer water level assumption used in the safety analysis, and that the need for a TS to support the pressurizer water level assumption used in the safety analysis should be addressed generically. The NRC has concluded that given the relatively low probability of plant operation with pressurizer levels exceeding safe limits per the analysis assumptions, there is no immediate safety concern, and thus the NRC will not require that STPNOC propose revised TSs to support the revised analysis assumption regarding the pressurizer water level with the proposed SG TS change. Also, the NRC believes that the need for revised TSs to support the analysis assumption regarding the pressurizer water level is being dealt with adequately on a generic basis, as discussed below. By letter dated April 13, 1999, from W. Beckner, NRC, to J. Davis, Nuclear Energy Institute (NEI), the NRC proposed changes to the Improved Standard Technical Specifications to address the pressurizer water level issue in accordance with the requirements of 10 CFR 50.36.

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NEI (which includes the Westinghouse Owners Group) is currently reviewing the NRC's proposal. The NRC will work with NEI to resolve the pressurizer water level program issue when NEI completes its review.

Sincerely,

ORIGINAL SIGNED BY

Thomas W. Alexion, Project Manager, Section 1
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Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

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