UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 27, 2001

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 - CHANGES TO BASES OF THE TECHNICAL SPECIFICATIONS

Dear Mr. Cottle:

By letters dated September 28, and December 11 and 27, 2000; and January 23 and 29, 2001; the STP Nuclear Operating Company (licensee) provided the Nuclear Regulatory Commission (NRC) pages and replacement instructions for corrections to the bases for the South Texas Project, Units 1 and 2 Technical Specifications (TSs). The revised pages were provided so that the NRC can update its official records of the STP TSs. Accordingly, the enclosed TS bases pages are placed or replaced in the NRC's official records.

Sincerely,

Mohan C. Thadani, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:
1. Letter from STP Nuclear Operating Company, dated September 28, 2000
2. Letter from STP Nuclear Operating Company, dated December 11, 2000
3. Letter from STP Nuclear Operating Company, dated December 27, 2000
4. Letter from STP Nuclear Operating Company, dated January 23, 2001
5. Letter from STP Nuclear Operating Company, dated January 29, 2001

cc w/encls: See next page

South Texas, Units 1 & 2

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September 28, 2000
NOC-AE-00000923
File No.: G20.02.02
G21.02.02
10CFR50.59
STI: 31168920

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Technical Specification Bases Change

The South Texas Project Technical Specification Bases Section SR 4.8.1.1.2.e.11 has been changed pursuant to 10CFR50.59. Words were added to the section to identify the sequencer as a support system for the associated diesel generator and those components actuated by a Mode I signal. Attached is a copy of the revised Technical Specification Bases page.

If there are any questions, please contact S. M. Head at (361) 972-7136 or me at (361) 972-7206.

Mark A. McBurnett
Director,
Quality & Licensing

kaw

Attachment: Revised Technical Specification Bases Page 3/4 8-13 (1 page)

Enclosure 1

cc:

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A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION (Continued)

SR 4.8.1.1.2.e.11

As required by Regulatory Guide 1.108, paragraph 2.a.(2), each DG is required to demonstrate proper operation for the DBA loading sequence to ensure that voltage and frequency are maintained within the required limits. Under accident conditions, prior to connecting the DGs to their respective busses, all loads are shed except load center feeders and those motor control centers that power Class 1E loads (referred to as "permanently connected" loads). Upon reaching 90% of rated voltage and frequency, the DGs are then connected to their respective busses.

Loads are then sequentially connected to the bus by the automatic load sequencer. This sequencing logic controls the permissive and starting signals to motor breakers to prevent overloading of the DGs due to high motor starting currents. The 10% load sequence time interval tolerance ensures that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load and that safety analysis assumptions regarding ESF equipment time delays are not violated.

The sequencer is considered a support system for the associated diesel generator and those components actuated by a Mode I signal (CR 00-10707).

The Frequency of 18 months is consistent with the recommendation of Regulatory Guide 1.108, paragraph 2.a.(2), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

SR 4.8.1.1.2.e.12

This SR verifies that the diesel will not start when the emergency stop lockout feature is tripped. This prevents any further damage to the diesel engine or generator.

SR 4.8.1.1.2.e.13

This SR verifies the requirements of Branch Technical Position PSB-1 that the load shedding scheme automatically prevents load shedding during the sequencing of the emergency loads to the bus. It also verifies the reinstatement of the load shedding feature upon completion of the load sequencing action.

SR 4.8.1.1.2.f

This Surveillance demonstrates that the DG starting independence has not been compromised. Also, this Surveillance demonstrates that each engine can achieve proper speed within the specified time when the DGs are started simultaneously.

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

December 11, 2000
NOC-AE-00000977
File No.: G09.06
STI 31212748
10CFR50.36

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Change to the Bases for Technical Specifications 3.8.1.3, 3.8.2.2, and 3.8.3.2

STPNOC has revised the Bases for the South Texas Project Technical Specifications in accordance with 10CFR50.59. The changes to the Bases clarify that the design basis for shutdown conditions does not include an accident with coincident loss-of-offsite power and single failure. The revised pages and replacement instructions are provided so that the NRC can update their copies of the Bases.

If there are any questions regarding these changes, please contact Mr. A. W. Harrison at 361-972-7298.

M. A. McBurnett
Director, Quality & Licensing

AWH/

Attachments:
1. Page replacement instructions
2. Revised Bases Pages

Enclosure 2

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Attachment 1

Page Replacement Instructions

Remove	Insert
B 3/4 8-1	B 3/4 8-1
B 3/4 8-2	B 3/4 8-2
B 3/4 8-14	B 3/4 8-14
B 3/4 8-15	B 3/4 8-15
B 3/4 8-16	B 3/4 8-16
B 3/4 8-17	B 3/4 8-17
	B 3/4 8-18
	B 3/4 8-19
	B 3/4 8-20

Attachment 2

Revised Bases Pages

3/4.8.1. 3/4.8.2. and 3/4.8.3 A.C. SOURCES, D.C. SOURCES, AND ONSITE POWER DISTRIBUTION

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criterion 17 of Appendix A to 10 CFR Part 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. In Modes 1, 2, 3, & 4 the OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses and are based upon maintaining at least two redundant sets of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss-of-offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974. The term, verify, as used in this context means to administratively check by examining logs or other information to determine if certain components are out-of-service for maintenance or other reasons. It does not mean to perform the Surveillance Requirements needed to demonstrate the OPERABILITY of the component.

BACKGROUND

The unit Class 1E AC Electrical Power Distribution System AC sources consist of the offsite power sources [preferred power sources, normal and alternate(s)], and the onsite standby power sources [Train A, Train B and Train C diesel generators (DGs)]. As required by 10 CFR 50, Appendix A, GDC 17, the design of the AC electrical power system provides independence and redundancy to ensure an available source of power to the Engineered Safety Feature (ESF) systems.

The onsite Class 1E AC Distribution System is divided into redundant load groups (trains) so that the loss of any one group does not prevent the minimum safety functions from being performed. Each train has connections to two preferred offsite power sources and a single DG.

Offsite power is transmitted to the plant switchyard at 345 kV by multiple circuits on four separate rights-of-way. The two unit standby transformers are energized from separate busses in the switchyard via independent feeders. Each standby transformer has the capacity to supply the Class 1E loads of both units. In normal operation, the Class 1E loads of each unit can be supplied by the standby transformers and/or its auxiliary unit transformer. In the event of a loss of power from its normal source that unit's Class 1E loads are

A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION (Continued)

manually transferred to the unit's auxiliary transformer or to the standby transformers.

In the event of a loss of preferred power, the ESF electrical loads are automatically connected to the DGs in sufficient time to provide for safe reactor shutdown and to mitigate the consequences of a Design Basis Accident (DBA) such as a loss of coolant accident (LOCA).

Ratings for Train A, Train B and Train C DGs satisfy the requirements of Regulatory Guide 1.108. The continuous service rating of each DG is 5500 kW with 10% overload permissible for up to 2 hours in any 24 hour period.

Refer to UFSAR Chapter 8 for a more complete description.

APPLICABLE SAFETY ANALYSES

The initial conditions of DBA and transient analyses in the FSAR, Chapter 6 and Chapter 15, assume ESF systems are OPERABLE. The AC electrical power sources are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System (RCS), and containment design limits are not exceeded.

The OPERABILITY of the AC electrical power sources is consistent with the initial assumptions of the Accident analyses and is based upon meeting the design basis of the unit. In Modes 1, 2, 3, and 4 this results in maintaining at least two trains of the onsite or one train of the offsite AC sources OPERABLE during Accident conditions in the event of:

a. An assumed loss of all offsite power or all onsite AC power; and

b. A worst case single failure.

The AC sources satisfy Criterion 3 of NRC Policy Statement.

A single train onsite AC source can effectively mitigate all but the most severe events with operator action in some cases. The events that cannot be mitigated by a single train onsite AC source are highly unlikely. When a risk-important system or component (for example a Standby Diesel Generator) is taken out of service, it is important to assure that the impact on plant risk of this and other equipment simultaneously taken out of service can be assessed. The Configuration Risk Management Program evaluates the impact on plant risk of equipment out of service. A brief description of the Configuration Risk Management Program is in Section 6.8.3 (administration section) of the Technical Specification.

LCO

Two qualified circuits between the offsite transmission network and the onsite Class 1E Electrical Power System and separate and independent DGs for each train ensure availability of the required power to shut down the reactor and maintain in a safe shutdown condition after an anticipated operational occurrence (AOO) or a postulated DBA.

Qualified offsite circuits are those that are described in the FSAR and are part of the licensing basis for the unit.

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION (Continued)

The 10-year Frequency is consistent with the recommendations of Regulatory Guide 1. 108, paragraph 2.b, and Regulatory Guide 1. 137, paragraph C.2.f.

SR 4.8.1.1.2.g

This SR provided assurance that any accumulation of sediment over time or the normal wear on the system has not degraded the diesels.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that: (1) the facility can be maintained in the shutdown or refueling condition for extended time periods, and (2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The alternate onsite emergency power source will be capable of being loaded with, but not limited to, one train of the following equipment: RHR, ECW, CCW, associated instrumentation, Control Room Makeup and Cleanup Filtration System and a 150-ton EAB Chiller. This alternate onsite emergency power source will be capable of being started and loaded in sufficient time to prevent the reactor coolant temperature from exceeding design limits.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," Revision 2, December 1979; 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977; and ASTM D975-81, ASTM D1552-79, ASTM D262282, ASTM D4294-83, and ASTM D2276-78. The standby diesel generators auxiliary systems are designed to circulate warm oil and water through the diesel while the diesel is not running, to preclude cold ambient starts. For the purposes of surveillance testing, ambient conditions are considered to be the hot prelube condition.

3.8.1.3

The OPERABILITY of the minimum AC sources during MODE 6 with ≥23' of water in the cavity is based on the following conditions:

a. The unit can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate AC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident.

In general, when the unit is shutdown, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1, 2, 3, and 4 have no specirfic analyses in MODES 5 and 6. Worst case bounding events are deemed not credible in MODES 5 and 6 because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

During MODES 1, 2, 3, and 4, various deviations from the analysis assumptions and design requirements are allowed within the Required Actions. This allowance is in recognition that certain testing and maintenance activities must be conducted provided an acceptable level of risk is not exceeded. During MODES 5 and 6, performance of a significant number of required testing and maintenance activities is also required. In MODES 5 and 6, the activities are generally planned and administratively controlled. Relaxations from MODES 1, 2, 3, and 4 LCO requirements are acceptable during shutdown modes based on:

a. The fact that time in an outage is limited. This is a risk prudent goal as well as a utility econonic consideration.

b. Requiring appropriate compensatory measures for certain conditions. These may include administrative controls, reliance on systems that do not ncessarily meet typical design requirements applied to systems credited in operating MODE analyses, or both.

c. Prudent utility consideration of the risk associated with multiple activities that could affect multiple systems.

d. Maintaining, to the extent practical, the ability to perform required functions (even if not meeting MODE 1, 2, 3, and 4 OPERABILITY requirements) with systems assumed to function during an event.

In the event of an accident during shutdown, this LCO ensures the capability to support systems necessary to avoid immediate difficulty, assuming either a loss of all offsite power or a loss of all onsite diesel generator (DG) power.

3.8.2.1

In order to ensure the ability of the batteries to perform their intended function, the batteries are normally maintained in a fully charged state and the environment in which the batteries are located is maintained within the parameters used to determine battery sizing and

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION (Continued)

operation. Verifying average electrolyte temperature avove the minimum for which the battery was sized, total battery terminal voltage on float charge, connection resistance values, and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates, and compares the battery capacity at that time with the rated capacity.

The Surveillance Requirements for demonstrating the OPERABILITY of the station batteries are based on the recommendations of Regulatory Guide 1.129, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February 1978, and IEEE Std 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The seven-day Frequency is conservative with respect to manufacturer recommendations and IEEE-450 (Ref. 9).

SR 4.8.2. 1. a

This action is performed on a nominal seven-day cycle and documents inspection of the battery and battery room condition to the following attributes:

- Charger output current and voltage,
- Pilot cell voltage, specific gravity and temperature (values-recorded)

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage, and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and 0.015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, are characteristic of a charged cell with adequate capacity. The seven-day frequency is conservative with respect to manufacturer, IEEE Std 450-1980 and regulatory guide recommendations.

SR 4.8.2.1.b

This action is performed on a nominal 92-day cycle and documents measurement of the battery parameters to include the following attributes:

- Voltage and specific gravity of each cell
- Electrolyte temperature of selected representative cells
- Connections are visually inspected and resistance measurement is performed only on a connection that appears to be loose or corroded

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION (Continued)

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage, and specific gravity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than 0.020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than 0.010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery. The 92-day frequency is consistent with manufacturer and regulatory guide recommendations.

Operation with a battery cell's parameter outside the normal limit but within the allowable value specified in Table 4.8-2 is permitted for up to seven days. During this seven-day period: (1) the allowable values for electrolyte level ensures no physical damage to the plates with an adequate electron transfer capability; (2) the allowable value for the average specific gravity of all the cells, not more than 0.020 below the manufacturer's recommended full charge specific gravity, ensures that the decrease in rating will be less than the safety margin provided in sizing; (3) the allowable value for an individual cell's specific gravity, ensures that an individual cells specific gravity will not be more than 0.040 below the manufacturer's full charge specific gravity and that the overall capability of the battery will be maintained within an acceptable limit; and (4) the allowable value for an individual cell's float voltage, greater than 2.07 volts, ensures the battery's capability to perform its design function.

SR 4.8.2.1.c.1, 2 & 3

This action is performed on an 18-month (maximum) cycle and documents inspection of the battery to include the following attributes:

- Detailed visual inspection of each cell, including plate condition
- Detailed visual inspection of battery rack
- Bolted connections cleaned, coated with anti-corrosion material and retorqued
- Resistance of bolted connections measured and recorded

Visual inspection and resistance measurements of inter-cell, inter-rack, inter-tier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR provided visible corrosion is removed during performance of SR. The surveillance frequency of 18 months exceeds the IEEE-450 recommendation of 12 months, and is consistent with extension of the refuel cycle to 18 months.

SR 4.8.2.1.c.4

This action is performed on an 18-month (maximum) cycle and documents the capability of the battery charger to supply rated current at 125 V for a period of eight hours. The battery charger supply is required to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied. The surveillance frequency is acceptable, and is intended to be consistent with the expected fuel cycle lengths.

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION (Continued)

SR 4.8.2. 1. d

A battery service test is a special test of battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements. The surveillance frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.129, which state that the battery service test should be performed during refueling operations, or at some other outage, with intervals between tests not to exceed 18 months.

SR 4.8.2. 1. e

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the "as found" condition, after having been in service, to detect any change in the capacity determined by the acceptance test. This test is intended to determine overall battery degradation due to age and usage. A performance discharge test is allowed in lieu of a service test once per 60 months.

SR 4.8.2. I.f

The performance discharge test surveillance frequency for this test is normally 60 months. If the battery has reached 85% of its expected life, or if the battery capacity has decreased by 10 percent or more of the manufacturer's rating, the surveillance frequency is reduced to 18 months because the test must be performed during the refueling operations. The 18 month interval exceeds the IEEE-450 recommendation.

3.8.3.2

The OPERABILITY of the required DC sources and electrical distribution system during shutdown is based on the following conditions:

a. The unit can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate AC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident.

In general, when the unit is shutdown, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1, 2, 3, and 4 have no specific analyses in MODES 5 and 6. Worst case bounding events are deemed not credible in MODES 5 and 6 because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

Specifications 3.8.2.2 and 3.8.3.2 require DC power sources and specified electric power distribution for equipment required to be operable during shutdown. If the DC sources or distribution system is inoperable, then the Specifications require the affected components to be declared inoperable or that core alterations and positive reactivity changes be stopped. For a required system or component to be operable, the definition of OPERABLE/OPERABILITY requires the availability of necessary support systems, instrumentation, and electrical power for the required system to meet the design basis requirements. In MODES 5 and 6, the design basis does not include single failure coincident with loss of off-site power. Consequently, where two trains or channels of equipment are required by the Technical Specifications during MODES 5 and 6, only one of the trains or channels is required to be backed by an emergency power source or battery. Inoperability of the battery for one channel or train does not affect components that have an operable battery on the other required channel or train. Required electric power distribution systems must be operable under accident conditions that are

applicable during shutdown, including seismic. For components that have only a detection function and no mitigation function during or after the accident, emergency power and safety related normal power are not required (e.g., Source Range instrumentation in Refueling Mode). When the function of those components is lost, the required actions to suspend core alterations or positive reactivity changes preclude the accident the components would be required to detect.

3/4.8.4 (Not Used)

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December 27, 2000
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Change to the Bases for Technical Specification 3/4.7.8

STPNOC has revised the Bases for the South Texas Project Technical Specifications in accordance with 10CFR50.59. The changes to the Bases clarify how the specification applies to situations where the Fuel Handling Building ventilation exhaust subsystem and the ventilation filtration subsystem both have one or more inoperable trains.

The revised pages and replacement instructions are provided so that the NRC can update their copies of the Bases.

If there are any questions regarding these changes, please contact Mr. A. W. Harrison at 361-972-7298.

M. A. McBurnett
Director, Quality & Licensing

AWH/

Attachments:
1. Page replacement instructions
2. Revised Bases Pages

Enclosure 3

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Attachment 2

Revised Bases Page

The compensatory action may include placing fans in pull-to-lock as necessary to preclude there being a motive force to transport contaminated air to a clean environment in the event of an accident. These compensatory actions also include administrative controls on opening plenums or other openings such that appropriate communication is established with the control room to assure timely closing of the system if necessary. Since the Control Room Envelope boundary integrity also affects operability of the overall system, entry and exit is administratively controlled. Administrative control of entry and exit through doors is performed by the person(s) entering or exiting the area. Extended opening of the boundary is coordinated with the control room with appropriate plans for closure and communication.

B 3/4.7.8 FUEL HANDLING BUILDING EXHAUST AIR SYSTEM

The FHB exhaust air system is comprised of two independent exhaust air filter trains and three exhaust ventilation trains. Each of the three exhaust ventilation trains has a main exhaust fan, an exhaust booster fan, and associated dampers. The main exhaust fans share a common plenum and the exhaust booster fans share a common plenum. An OPERABLE ventilation exhaust train consists of any OPERABLE main exhaust fan, any OPERABLE exhaust booster fan, and appropriate dampers.

The OPERABILITY of the Fuel Handling Building Exhaust Air System ensures that radioactive materials leaking from the ECCS equipment within the FHB following a LOCA are filtered prior to reaching the environment. Operation of the system with the heaters operating for the least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing

The time limits associated with the ACTIONS to restore an inoperable train to OPERABLE status are consistent with the redundancy and capability of the system and the low probability of a design basis accident while the affected trains(s) is out of service. The allowed outage time for one train of FHB exhaust ventilation or one exhaust filtration train being inoperable, or a combination of an inoperable exhaust ventilation train and an inoperable exhaust filtration train is 7 days. With more than one inoperable train of either FHB exhaust filtration or FHB exhaust ventilation, or with combinations involving more than one inoperable train of either the exhaust ventilation or the exhaust filtration, the allowed outage time is 12 hours. A limited allowed outage time of 12 hours is allowed for multiple trains to be out of service simultaneously in recognition of the fact that there are common plenums and some maintenance or testing activities required opening or entry into these common plenums. This time is reasonable to diagnose, plan, and possibly repair problems with the boundary or the ventilation system. This is acceptable based on the low probability of a design basis event in that brief allowed outage time and because administrative controls impose compensatory actions that reduce the already small risk associated with being in the ACTION. The compensatory actions are consistent with the intent of GDC 19, GDC 60 and Part 100 to protect plant personnel and the public from potential hazards such as radioactive contamination, smoke, and temperature, etc. Pre-planned measures should be available to address these concerns for intentional and unintentional entry into the condition. The compensatory action may include placing fans in pull-to-lock as necessary to preclude there being a motive force to transport contaminated air to a clean environment in the event of an accident. These compensatory actions include administrative controls on opening plenums or other openings such that appropriate communication is established with the control room to assure timely closing of the system if necessary. Since the Fuel Handling Building boundary integrity also affects operability of the overall system, entry and exit is administratively controlled. Administrative control of entry and exit through doors is performed by the person(s) entering or exiting the area. Extended opening of the boundary is coordinated with the control room with appropriate plans for closure and communication.

B 3/4.7.9 (Not Used)

Nuclear Operating Company

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

January 23, 2001
NOC-AE-01001009
File No.: G09.06
STI 31228629
10CFR50.36

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Change to the Bases for Technical Specification 3/4.4.9

STPNOC has revised the Bases for the South Texas Project Technical Specifications in accordance with 10CFR50.59. The changes to the Bases describe the administrative controls imposed for low temperature overpressure protection when the pressurizer power operated relief valves are not available.

The revised pages and replacement instructions are provided so that the NRC can update their copies of the Bases.

If there are any questions regarding these changes, please contact Mr. A. W. Harrison at 361-972-7298.

M. A. McBurnett
Director, Quality & Licensing

AWH/

Attachments:
1. Page replacement instructions
2. Revised Bases Pages

Enclosure 4

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Attachment 2

Revised Bases Pages

LOW TEMPERATURE OVERPRESSURE PROTECTION (Continued)

overshoot beyond the PORV Setpoint which can occur as a result of time delays in signal processing and valve opening, instrument uncertainties, and single failure. To ensure that mass and head input transients more severe than those assumed cannot occur, Technical Specifications require lockout of all high head safety injection pumps while in MODE 5 and MODE 6 with the reactor vessel head on. All but one high head safety injection pump are required to be locked out in MODE 4. Technical Specifications also require lockout of the positive displacement pump and all but one charging pump while in MODES 4, 5, and 6 with the reactor vessel head installed and disallow start of an RCP if secondary temperature is more than 50°F above primary temperature. The Technical Specifications also require ECCS accumulator isolation when ECCS accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed by Figures 3.4-2 and 3.4-3.

Administrative controls and two RHR relief valves will be used to provide cold overpressure protection (COMS) during the ASME stroke testing of two administratively declared inoperable PORVS. These administrative controls include the following:

a. When RCS pressure is being maintained by the low pressure letdown control valve, the normal letdown orifices are bypassed but not isolated.
b. Only one centrifugal charging pump (CCP) will be allowed to be operable; this minimizes the potential for a mass input overpressure transient.
c. High Head Safety Injection (HHSI) pumps will not operate during water solid operations with the PORV(s) inoperable to minimize the potential for creating a cold overpressure transient.
d. The RPV pressure will be controlled at the minimum value necessary to perform the required testing of the inoperable PORV(s) (325-400 psig).
e. A Reactor Coolant Pump shall not be started with one or more of the RCS cold leg temperatures less than or equal to 350 degrees F unless the secondary side water temperature of each steam generator is less than 50 degrees F above the RCS cold leg temperature.
f. The positive displacement pump will be demonstrated inoperable during water solid operations to minimize the potential for a mass input overpressure event, and
g. The pressurizer heaters will be inoperable during water solid operations to minimize the potential for heat input overpressure transient until a pressurizer bubble is ready to be drawn.

During the performance of the PORV function test, two RHR trains will be OPERABLE and in operation with the auto closure interlock bypassed (or deleted) to provide COMS.

With one PORV inoperable, COMS will be provided during the ASME test by the OPERABLE PORV and one RHR relief valve associated with an OPERABLE and operating RHR train which has the auto closure interlock bypassed (or deleted). Each RHR relief valve provides sufficient capacity to relieve the flow resulting from the maximum charging flow with concurrent loss of letdown. Analysis conservatively demonstrates that the RHR relief valves limit RCS pressure to approximately 590 psig.

Therefore two OPERABLE and operating RHR trains or one OPERABLE PORV and one OPERABLE and operating RHR train will provide adequate and redundant overpressure protection. Use of the RHR relief valves will maintain the RCS pressure below the low temperature limits of ASME Section III, Appendix G.

With regard to the MODE 6 applicability of this Technical Specification, the statement "with the head on the reactor vessel" means any time the head is installed with or without tensioning the RPV studs.

The Maximum Allowed PORV Setpoint for the COMS will be updated based on the results of examinations of reactor vessel material irradiation surveillance specimens performed as required by 10 CFR Part 50, Appendix H.

3/4.4.10 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i).

Components of the Reactor Coolant System were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition and Addenda through Winter 1975.

3/4.4.11 REACTOR VESSEL HEAD VENTS

Reactor vessel head vents are provided to exhaust noncondensible gases and/or steam from the Reactor Coolant System that could inhibit natural circulation core cooling. The OPERABILITY of at least two reactor vessel head vent paths ensures that the capability exists to perform this function.

The valve redundancy of the reactor vessel head vent paths serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, power supply, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the reactor vessel head vents are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

Nuclear Operating Company

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

January 29, 2001
NOC-AE-01001015
File No.: G09.06
STI 31231455
10CFR50.36

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Change to the Bases for Technical Specification 4.0.3

STPNOC has revised the Bases for the South Texas Project Technical Specifications in accordance with 10CFR50.59. The changes to the Bases for Technical Specification 4.0.3 to delete the statement that missed surveillance requirements are reportable. This corrects the Bases to be consistent with the latest change to 10CFR50.73.

The revised pages and replacement instructions are provided so that the NRC can update their copies of the Bases.

If there are any questions regarding these changes, please contact Mr. A. W. Harrison at 361-972-7298.

M. A. McBurnett
Director, Quality & Licensing

AWH/

Attachments:
1. Page replacement instructions
2. Revised Bases Pages

Enclosure 5

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Attachment 2

Revised Bases Pages

OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

April 26, 2001

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 - CHANGES TO BASES OF THE TECHNICAL SPECIFICATIONS

Dear Mr. Cottle:

By letters dated September 28, and December 11 and 27, 2000; and January 23 and 29, 2001; the STP Nuclear Operating Company (licensee) provided the Nuclear Regulatory Commission (NRC) pages and replacement instructions for corrections to the bases for the South Texas Project, Units 1 and 2 Technical Specifications (TSs). The revised pages were provided so that the NRC can update its official records of the STP TSs. Accordingly, the enclosed TS bases pages are placed or replaced in the NRC's official records.

Sincerely,
/RA/
Mohan C. Thadani, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:
1. Letter from STP Nuclear Operating Company, dated September 28, 2000
2. Letter from STP Nuclear Operating Company, dated December 11, 2000
3. Letter from STP Nuclear Operating Company, dated December 27, 2000
4. Letter from STP Nuclear Operating Company, dated January 23, 2001
5. Letter from STP Nuclear Operating Company, dated January 29, 2001

cc w/encls: See next page

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