

May 10, 2001

MEMORANDUM TO: Biweekly Notice Coordinator

FROM: Mohan C. Thadani, Senior Project Manager, Section 1 **/RA/**
Project Directorate IV & Decommissioning
Division of Licensing Project Management

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE
OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY
OPERATING LICENSES, PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION, AND OPPORTUNITY FOR
HEARING (TAC NOS. MB1414 AND MB1422)

STP Nuclear Operating Company, Docket Nos. 50-498 and 50-499, South Texas Project,
Units 1 and 2, Matagorda County, Texas

Date of amendment request: February 12, 2001

Description of amendment request: The proposed amendment will revise Technical
Specifications surveillance requirement 4.4.6.2.2.e, which refers to American Society of
Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, paragraph
IWV-3427(b) as a requirement for demonstrating that each Reactor Coolant System Pressure
Isolation Valve specified in TS Table 3.4-1 is operable. Part 10 of the ASME Operations and
Maintenance (OM) Standards, OMa-1988, is currently the applicable code for these valves and
does not have these requirements.

Basis for proposed no significant hazards consideration determination: As required by
10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards
consideration, which is presented below:

Pursuant to 10 CFR 50.91, this analysis provides a determination that the proposed
change to the Technical Specifications described previously does not involve any
significant hazards consideration as defined in 10 CFR 50.92.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This Technical Specification change only affects trending of valve leakage rate test results to anticipate the expected leakage rate performance of Reactor Coolant System pressure isolation valves. Redundant pressure isolation valves are included in the plant to ensure continued protection of lower pressure systems from exposure to the higher pressure of the Reactor Coolant System in the event that excessive leakage develops in an isolation valve. In addition, leakage rate tests of Reactor Coolant System pressure isolation valves will continue to be performed with no change in the accepted amount of leakage or frequency. Therefore, the proposed change does not involve a significant increase in the probability of an accident previously evaluated.

The limiting event associated with these valves is a Loss of Coolant Accident. This has already been reviewed as part of the South Texas Project Updated Final Safety Analysis Report. Therefore, the proposed change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed change only removes a requirement for trending of pressure isolation valve leakage rates. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

There is no change in the design of the plant associated with this proposed license amendment. The only impact of this change is in the prediction of when a particular pressure isolation valve may have a leakage rate higher than what is allowed. Adverse test results will be addressed under the corrective action program and by application of the Maintenance Rule. Engineering analysis of test results can take into account special circumstances associated with a test that would affect the conclusions.

Leakage rate test measurements of South Texas Project Reactor Coolant System isolation valves will continue to be taken pursuant to the surveillance requirements of Technical Specification 4.4.6.2.2, which is consistent with the requirements of code OMa-1988, paragraph 4.2.2.3.e for analysis of leakage rates. Code OMa-1988, paragraph 6.3, requires records of tests, including analysis of deviations in test values. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the request for amendments involves no significant hazards consideration.

Attorney for licensee: Jack R. Newman, Esq., Morgan, Lewis & Bockius, 1800 M Street, NW.,
Washington, DC 20036-5869

NRC Section Chief: Robert A. Gramm

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