



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

December 1, 2004
NOC-AE-04001816
10CFR50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
License Amendment Request
Supplement to Proposed Revision to the Technical Specifications Regarding
Mode Change Limitations Using the Consolidated Line Item Improvement Process

Reference: Letter from T. J. Jordan, STPNOC, to NRC Document Control Desk, dated
February 3, 2004 (NOC-AE-04001668) (TAC Nos. MC1944 / MC1945)

STP Nuclear Operating Company (STPNOC) submitted the referenced proposed amendment to South Texas Project Operating Licenses requesting revision of mode change limitations associated with Technical Specifications 3.0.4 and 4.0.4 consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Traveler number TSTF-359, "Increase Flexibility in Mode Restraints," and the Consolidated Line Item Improvement Process (CLIIP).

The attachment to this letter responds to NRC staff reviewer comments on the proposed change and proposes an additional change to Technical Specification (TS) 3.4.8. A revised TS page 3/4 4-26 is attached. This additional proposed change is consistent with TSTF-359. STPNOC considers this additional proposed change to be bounded by the original licensee evaluation and the No Significant Hazards Determination submitted in the referenced letter remains valid.

The STPNOC Plant Operations Review Committee has reviewed and concurred with the proposed change to the Technical Specifications.

STPNOC is submitting this license amendment request application as a result of a mutual agreement by an industry consortium of six plants known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of the six plants operated by TXU Energy, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STPNOC, and Arizona Public Service Company. Each of the STARS plants has or will be submitting a similar license amendment request on a staggered basis.

STI: 31806816

ADD

In accordance with 10 CFR 50.91(b), STPNOC is notifying the State of Texas of this license amendment request by providing a copy of this letter and its attachments.

If there are any questions regarding the proposed amendment, please contact Mr. J. R. Morris at (361) 972-8652 or me at (361) 972-7902

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

Executed on December 1, 2004



T. J. Jordan
Vice President,
Engineering & Technical Services

jrm/

Attachments:

1. Description of Changes and Safety Evaluation
2. Annotated Technical Specification Page
3. Technical Specification Bases Changes (Information Only)

cc:

(paper copy)

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Attachment 1

Description of Changes and Safety Evaluation

Description of Changes and Safety Evaluation

Reference: Letter from T. J. Jordan, STPNOC, to NRC Document Control Desk, dated February 3, 2004 (NOC-AE-04001668)

1.0 Description

STP Nuclear Operating Company (STPNOC) submitted the referenced proposed amendment to South Texas Project Operating Licenses requesting revision of mode change limitations associated with Technical Specifications 3.0.4 and 4.0.4 consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Traveler number TSTF-359, "Increase Flexibility in Mode Restraints," and the Consolidated Line Item Improvement Process (CLIIP).

The changes proposed in this supplement address NRC staff reviewer comments regarding the original proposed amendment and propose an additional change to Technical Specification (TS) 3.4.8.

2.0 Assessment

2.1 Applicability of Published Safety Evaluation

STPNOC has reviewed the safety evaluation dated August 2, 2002, as part of the CLIIP. This review included the NRC staff evaluation and the supporting information provided to support TSTF-359, Revision 9. STPNOC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to South Texas Project (STP) Units 1 and 2, and justify incorporation of these additional proposed changes into the STP TS.

2.2 Discussion of Proposed Change

Based on NRC staff review comments, and in order to improve consistency with Improved Technical Specifications, TSTF-359, and the proposed changes to Specification 3.0.4 documented in the referenced letter, Specification 3.4.8 (Reactor Coolant System - Specific Activity) is being modified to permit the application of TS 3.0.4.c for entry into Modes 1, 2, and 3.

A summary of the proposed change and associated justification, presented in table format, is provided below.

TS Number	Description	Proposed Change	Justification
3.4.8	Reactor Coolant System - Specific Activity	Added ACTION c. which states that Specification 3.0.4.c is applicable for entry into Modes 1, 2, and 3 (with T_{avg} greater than or equal to 500°F)	Provide consistency with NUREG-1431 Improved Technical Specifications, TSTF-359, and associated CLIIP guidance.

3.0 Regulatory Analysis

3.1 No Significant Hazards Determination

STPNOC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. STPNOC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to STP and to the additional changes proposed in this letter, and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

The plant-specific verifications and commitments in the referenced letter are applicable to the proposed changes to TS 3.4.8 described herein.

The TS Bases for Specification 3.4.8 will be revised to reflect the proposed changes, upon NRC approval of this amendment application.

4.0 Environmental Evaluation

STPNOC has reviewed the environmental evaluation included in the model safety evaluation dated August 2, 2002, as part of the CLIIP. STPNOC has concluded that the staff's findings presented in that evaluation are applicable to STP and the additional changes proposed in this letter, and the evaluation is hereby incorporated by reference for this application.

Attachment 2

Annotated Technical Specification Pages

REACTOR COOLANT SYSTEM3/4.4.8 SPECIFIC ACTIVITYLIMITING CONDITION FOR OPERATION

3.4.8 The specific activity of the reactor coolant shall be limited to:

- a. Less than or equal to 1 microCurie per gram DOSE EQUIVALENT I-131, and
- b. Less than or equal to 100/ \bar{E} microCuries per gram of gross radioactivity.

APPLICABILITY: MODES 1, 2, 3, 4, and 5.

ACTION:

MODES 1, 2 and 3*:

- a. With the specific activity of the reactor coolant greater than 1 microCurie per gram DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval, or exceeding the limit line shown on Figure 3.4-1, be in at least HOT STANDBY with T_{avg} less than 500°F within 6 hours; and
- b. With the gross specific activity of the reactor coolant greater than 100/ \bar{E} microCuries per gram, be in at least HOT STANDBY with T_{avg} less than 500°F within 6 hours.

c. Specification 3.0.4.c is applicable.

MODES 1, 2, 3, 4, and 5:

With the specific activity of the reactor coolant greater than 1 microCurie per gram DOSE EQUIVALENT I-131 or greater than 100/ \bar{E} micro-Curies per gram, perform the sampling and analysis requirements of Item 4.a) of Table 4.4-4 until the specific activity of the reactor coolant is restored to within its limits.

*With T_{avg} greater than or equal to 500°F.

Attachment 3

Technical Specifications Bases Changes (Information Only)

Specification 3/4.4.8 (Reactor Coolant System - Specific Activity) Bases

[The following will be added to this Bases section.]

Action c. permits the use of the provisions of LCO 3.0.4.c. This allowance permits entry into the applicable MODE(S) while relying on the ACTIONS.