

# The Light company

Houston Lighting & Power

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February 26, 1991

ST-HL-AE-3708

File No.: G9.06

10CFR50.90

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

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Proposed Amendment to the Unit 1 and 2  
Technical Specification Surveillance 4.6.1.2

The purpose of this submittal is to propose a change to South Texas Project Electric Generating Station (STPEGS) Technical Specification Surveillance 4.6.1.2. Surveillance 4.6.1.2 currently specifies that the methods of American National Standard Institute (ANSI) 45.4-1972 be used to verify containment leakage rates. The proposed change will allow the enhancements of Appendix J of 10CFR50 to be used to satisfy Surveillance 4.6.1.2.

Houston Lighting & Power Company (HL&P) has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. The basis for this determination is provided in the attachments. In addition, based on the information contained in this submittal and the NRC Final Environmental Assessment for STPEGS Units 1 and 2, HL&P has concluded that, pursuant to 10CFR51, there are no significant radiological or non-radiological impacts associated with the proposed action, and the proposed license amendment will not have a significant effect on the quality of the environment.

The STPEGS Nuclear Safety Review Board has reviewed and approved the proposed changes.

In accordance with 10CFR50.91(b), HL&P is providing the State of Texas with a copy of this proposed amendment.

A2/011.N20

A Subsidiary of Houston Industries Incorporated

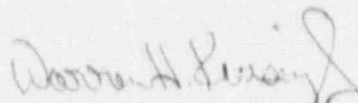
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Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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If you should have any questions concerning this matter, please contact  
Mr. A. W. Harrison at (512) 972-7298 or myself at (512) 972-7921.



Warren H. Kinsey, Jr.  
Vice President  
Nuclear Generation

GCS/sgs

- Attachments:
1. Significant Hazards Evaluation for a  
Proposed Change to Technical Specification  
Surveillance 4.6.1.2
  2. Proposed Change to Technical Specification  
Surveillance 4.6.1.2
  3. Proposed Change to Updated Final Safety  
Analysis Report

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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cc:

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L4/NRC/

## In the Matter

Docket Nos. 50-493  
50-499

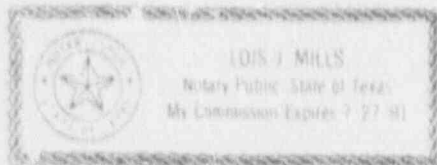
## AFFIDAVIT

Warren H. Kinsey, Jr. being duly sworn hereby deposes and says that he is Vice President, Nuclear Generation, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed changes to the South Texas Project Electric Generating Station Technical Specification Surveillance 4.6.1.2; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.

Warren H. Kinsey, Jr.  
Vice President, Nuclear Generation

STATE OF TEXAS

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 26<sup>th</sup> day of February, 1991.



Lois G. Mills  
Notary Public in and for the  
State of Texas

ATTACHMENT 1

SIGNIFICANT HAZARDS EVALUATION  
FOR A PROPOSED CHANGE TO TECHNICAL  
SPECIFICATION SURVEILLANCE 4.6.1.2



SIGNIFICANT HAZARDS EVALUATION  
FOR A PROPOSED CHANGE TO TECHNICAL  
SPECIFICATION SURVEILLANCE 4.6.1.2

Background

In 1973, when the Commission initially promulgated its requirements concerning containment integrated leakage rate testing (10CFR50 Appendix J), the Commission required licensees to use state-of-the-art leakage test methodology and specifically called for Type A test methods described in ANSI N45.4-1972, "Leakage Rate Testing of Containment Structure for Nuclear Reactors" (Appendix J, Sec. III.A.3). This standard accepted two techniques for evaluating test results: the Total Time data analysis technique and the Point-to-Point data analysis technique.

Subsequent advances in leakage rate testing technology have provided improved test methods, including the Mass Point method. The Mass Point method was incorporated in a newer standard, ANSI/ANS-56.8-1987, "Containment System Leakage Testing Requirements".

The STPEGS Technical Specifications were written using the Standard Technical Specifications as a model. The Standard Technical Specifications state that the methods and provisions of ANSI N45.4-1972 must be used. STPEGS Technical Specifications as approved on August 21, 1987 state that the methods and provisions of ANSI N45.4-1972 are to be used to satisfy the Containment Leakage Surveillance (4.6.1.2).

In Federal Register 53FR45890, November 15, 1988, the NRC amended Appendix J to explicitly permit use of the Mass Point method. The NRC staff had accepted the Mass Point method as an improved alternative method of calculating containment leakage rates. Strict interpretation of Appendix J had previously prevented use of this method.

Although Appendix J was revised, the requirements of STPEGS Technical Specification Surveillance 4.6.1.2 continue to endorse the methods and provisions of ANSI N45.4-1972. This prevents STPEGS from using the state-of-the-art leakage test methodology of ANSI/ANS 56.8-1987 to satisfy Technical Specification Surveillance 4.6.1.2 requirements. Both methods were used during the Type A test performed in the Unit 1 third refueling outage and the advantages of the enhanced methodology of ANSI/ANS 56.8-1987 were demonstrated.

#### Proposed Change

Modify Technical Specification Surveillance 4.6.1.2 to delete the reference to ANSI 45.2-1972 and reference the methods and provisions endorsed in 10CFR50 Appendix J. This will prevent future administrative Technical Specification changes if 10CFR50 Appendix J is revised.

#### Safety Evaluation

Based on the above, the proposed change is administrative in nature. HL&P has reviewed ANSI/ANS-56.8-1987 and determined that the methods and provisions are an enhanced calculational method appropriate for use at STPEGS. Since the proposed method has been reviewed, approved and incorporated into 10CFR50 Appendix J, there is no safety significance associated with the proposed change.

#### Determination of Significant Hazards

Pursuant to 10CFR50.91 this analysis provides a determination that the proposed change to Technical Specifications does not involve a significant hazards consideration as defined in 10CFR50.92.

1. The proposed change does not involve a significant increase in the probability or consequences of a previously evaluated accident. The purpose of an Integrated Leak Rate Test is to determine the leakage rate of containment. Therefore, changing the method of evaluating test data will have no effect on the probability of an accident previously evaluated. The consequences of a previously evaluated accident remain unchanged because the new method of evaluating test data has been reviewed and approved by the NRC staff and determined to be an improved alternative method of calculating containment leakage rates. HL&P has reviewed ANSI/ANS-56.8-1987 and agrees with the NRC determination.
2. The proposed change does not create the possibility of a new or different accident from any previously evaluated. There are no changes to the design or operation of STPEGS as a result of the proposed change. Therefore, a new or different accident from a previously evaluated accident is not created.

Determination of Significant Hazards (cont'd)

3. The proposed change does not involve a significant reduction in the margin of safety. The methods and provisions of 10CFR50 Appendix J are state-of-the-art for calculation of containment leakage rates. These methods and provisions have been reviewed and approved by the NRC staff as not involving a significant reduction in the margin of safety. HL&P has reviewed ANSI/ANS-56.8-1987 and determined that the enhanced calculational methods are appropriate for use at STPEGS.

Conclusion

The proposed change is administrative in nature and is consistent with the requirements of 10CFR50 Appendix J. HL&P has reviewed ANSI/ANS-56.8-1987 and determined that the methods and provisions are an enhanced calculational method appropriate for use at STPEGS. HL&P requests that the proposed change be approved.