

# The Light company

Houston Lighting & Power

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

July 20 1990

ST-HL-AE-3527

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  
Units 1 and 2 Technical Specification 6.5.2.2

Reference: Letter dated December 18, 1989 from HL&P to the NRC  
(ST-HL-AE-3216)

The purpose of this submittal is to revise the proposed Technical Specification 6.5.2.2. In telephone conversations with the NRC staff several comments were provided to Houston Lighting and Power (HL&P) regarding the referenced submittal of a proposed change to Technical Specification 6.5.2.2. The attachment to this submittal provides a revised submittal of proposed changes to Technical Specification 6.5.2.2 in response to the NRC comments.

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.

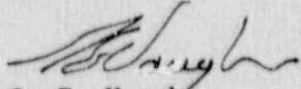
9008030078 900730  
PDR ADOCK 05000498  
PDC

*Accol*

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

ST-HL-AE-3527  
File No.: G9.06  
Page 2

If you should have any questions concerning this matter, please contact  
Mr. M. A. McBurnett at (512) 972-8530 or myself at (512) 972-7921.



G. E. Vaughn  
Vice President  
Nuclear Generation

GCS/nl

- Attachments:
1. Significant Hazards Evaluation for a Proposed  
Change in the Nuclear Safety Review Board  
Composition.
  2. Proposed Technical Specification 6.5.2.2.

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

ST-HL-AE-3527  
File No.: G9.06  
Page 3

cc:

Regional Administrator, Region IV  
Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

George Dick, Project Manager  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

J. I. Tapia  
Senior Resident Inspector  
c/o U. S. Nuclear Regulatory  
Commission  
P. O. Box 910  
Bay City, TX 77414

J. R. Newman, Esquire  
Newman & Holtzinger, P.C.  
1615 L Street, N.W.  
Washington, DC 20036

D. E. Ward/R. P. Verret  
Central Power & Light Company  
P. O. Box 2121  
Corpus Christi, TX 78403

J. C. Lanier  
Director of Generation  
City of Austin Electric Utility  
721 Barton Springs Road  
Austin, TX 78704

R. J. Costello/M. T. Hardt  
City Public Service Board  
P. O. Box 1771  
San Antonio, TX 78296

Rufus S. Scott  
Associate General Counsel  
Houston Lighting & Power Company  
P. O. Box 61867  
Houston, TX 77208

INPO  
Records Center  
1100 Circle 75 Parkway  
Atlanta, GA 30339-3064

Dr. Joseph M. Hendrie  
50 Bellport Lane  
Bellport, NY 11713

D. K. Lecker  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78704

Revised 12/15/89



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power  
Company, et al.,

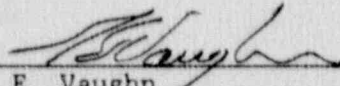
South Texas Project  
Units 1 and 2

)  
)  
)  
)  
)  
)  
)

Docket Nos. 50-498  
50-499


AFFIDAVIT

G. E. Vaughn 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 6.5.2.2; 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.

  
G. E. Vaughn  
Vice President, Nuclear Generation

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 30<sup>th</sup> day of July, 1990.



  
Minnie Gonzales  
Notary Public in and for the  
State of Texas

ATTACHMENT 1

SIGNIFICANT HAZARDS EVALUATION  
FOR A PROPOSED CHANGE IN THE  
NUCLEAR SAFETY REVIEW BOARD COMPOSITION

SIGNIFICANT HAZARDS EVALUATION  
FOR A PROPOSED CHANGE IN THE  
NUCLEAR SAFETY REVIEW BOARD COMPOSITION

Background

Technical Specification 6.5.2.2 requires that the Nuclear Safety Review Board (NSRB) composition consist of managers by specific title. The specific titles include the General Manager NSRB, General Manager South Texas Project Management, Vice President Nuclear Plant Operations, General Manager Nuclear Assurance and General Manager South Texas Project Operations Support. Several of the management titles listed are no longer in use at STPEGS.

Proposed Change

Delete specific management titles from Technical Specifications and add a description which ensures top level managers compose the NSRB and that these managers collectively have the capability to review the technical matters as listed in Attachment 2.

Safety Evaluation

In an effort to avoid future administrative Technical Specification changes when organization evolutions occur, specific management titles for the composition of the NSRB should be avoided. The proposed changes ensure the level and range of expertise is maintained in the composition of the NSRB. This is accomplished by requiring a NSRB chairman and four senior top-level managers as members of the NSRB. Five members report at least to the vice president level in the management of STPEGS and additional members are appointed by the Group Vice President, Nuclear so the NSRB collectively can review the technical subjects listed in Technical Specification 6.5.2.1. These proposed changes will allow HL&P and NRC resources to be better utilized on more important safety issues instead of utilizing resources on administrative Technical Specification changes. This proposed change will allow organization evolutions to occur without requiring Technical Specification changes.

The proposed change will ensure that the technical subjects listed in the Updated Final Safety Analysis Report (UFSAR) 13.4.2.1 are included in Technical Specification 6.5.2.2. The proposed change will require that NSRB members be selected so that the members collectively have the capability to review the technical subjects listed in UFSAR 13.4.2.1.

Members of the NSRB are qualified in accordance with ANSI 3.1-1981 and Regulatory Guide 1.8.



### Determination of Significant Hazards

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

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change is administrative in nature and does not affect the assumptions contained in the Updated Final Safety Analysis Report nor does the change affect Technical Specifications that preserve safety analysis assumptions. Because no aspects of the STPEGS organization that are important to safety are removed or diminished, the proposed amendment will not involve a significant increase in the probability or consequences of any accident previously evaluated.
2. The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed amendment is administrative in nature and does not involve any changes to plant design or configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident.
3. The proposed change does not involve a significant reduction in the margin of safety. The proposed changes do not remove or diminish any elements of the nuclear organization that are essential to the safe operation of STPEGS. The proposed change deletes specific management titles and replaces these titles with qualification requirements. This will not decrease the effectiveness of the NSRB and maintains the collective talents of the NSRB. The proposed changes do not involve any changes to plant operating systems or associated safety analyses. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

### Conclusion

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists. This guidance includes examples (51FR7750) of the type of amendments that are considered not likely to involve significant hazards considerations. The changes proposed are similar to the examples of administrative changes identified in 51FR7750.