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Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

November 23, 1993
ST-HL-AE-4625
File No.: G09.06
10CFR50.90,
10CFR50.92, 10CFR51

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

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Proposed Amendment to the Technical Specification 3.8.1.1

Houston Lighting & Power (HL&P) proposes to amend Facility Operating Licenses NPF-76 and NPF-80 for South Texas Project Units 1 and 2 by incorporating the attached proposed amendment to Technical Specification 3.8.1.1, Electrical Power System - A.C. Sources - Operating. The purpose of the amendment is to eliminate the unnecessary testing of the Standby Diesel Generators.

HL&P has reviewed the proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, HL&P has determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment. The STPEGS Nuclear Safety Review Board has reviewed and approved the proposed change.

The required affidavit, along with a Safety Evaluation and No Significant Hazards Consideration Determination associated with the proposed change, and markedup effected pages of the Technical Specifications are included as attachments to the letter.

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

Project Manager on Behalf of the Participants in the South Texas Project

A001

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.

J. F. Groth
Vice President
Nuclear Generation

JFG/tck

Attachment: 1. Affidavit

2. Safety Evaluation and No Significant Hazards Consideration Determination

3. Proposed Technical Specification Change 3.8.1.1.

c:

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U. S. Nuclear Regulatory Comm.
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ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Houston Lighting & Power Company, et al.,	)	Docket Nos. 50-498 50-499
	)	
South Texas Project Units 1 and 2	)	

AFFIDAVIT

I, J. F. Groth, being duly sworn, hereby depose and say that I am Vice President, Nuclear Generation, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached Proposed Amendment to the Technical Specification 3.8.1.1; that I am familiar with the content thereof; and that the matters set forth therein are true and correct to the best of my knowledge and belief.

J. F. Groth
Vice President,
Nuclear Generation

STATE OF TEXAS)
)
)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 23rd day of NOVEMBER, 1993.

B. DIANA SCHUMANN
Notary Public, State of Texas
My Commission Expires 7-1-95

B. Diana Schumann
Notary Public in and for the
State of Texas

TSC\93-314.001

ATTACHMENT 2

SAFETY EVALUATION
AND
NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION

Background

While studying the surveillance requirements in Technical Specifications (TS) that require testing during power operation, the U.S. Nuclear Regulatory Commission (NRC), found safety can be improved, equipment degradation decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing that the TS require during power operation. To assist licensees in preparing a license amendment request to implement these recommendations as line-item TS improvements, Generic Letter 93-05, Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing during Power Operations, was issued in September of 1993. One of these recommendations involved the elimination and/or reevaluation of Standby Diesel Generator (SDG) testing. The implementation of these recommended changes will eliminate the need to perform SDG operability testing unless that SDG is declared inoperable.

Description of Proposed Changes

The proposed change to STPEGS Technical Specifications 3.8.1.1 Actions are:

Action a,	delete "Demonstrate the OPERABILITY of each standby diesel generator that has not been successfully tested within the past 24 hours by performing Surveillance Requirement 4.8.1.1.2.a.2 for each such standby diesel generator, separately, within 24 hours."
Action b,	add "an inoperable support system, an independently testable component, or" to the causes not requiring an operability test.
Action b,	delete the 24 hour time limit and add "8 hours, unless the absence of any potential common mode failure for the remaining diesel generator(s) is demonstrated."
Action b,	delete * and from bottom of page "*This test is required to be completed regardless of when the inoperable standby diesel generator(s) is restored to OPERABILITY."
Action c,	add "an inoperable support system, an independently testable component, or" to the causes not requiring an operability test.

Action c,	add "unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated."
Action c,	delete * and from bottom of page "*This test is required to be completed regardless of when the inoperable standby diesel generator is restored to OPERABILITY."
Action e,	delete "demonstrate the OPERABILITY of three standby diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.2 within 8 hours unless the standby diesel generators are already operating."

The proposed change to STPEGS Technical Specifications Surveillance Requirement 4.8.1.1.2 are:

Item 4.8.1.1.2a.3	Replace "less than or equal to 10 minutes*" with "accordance with manufacturers recommendations".
Item 4.8.1.1.2e.7	Replace "4.8.1.1.2e.6)b)" with "4.8.1.1.2a.2"
** Note at bottom of page 3/4 8-6	Replace "4.8.1.1.2e.6)b)" with "4.8.1.1.2a.2" and "1 hour" with "2 hours"

Safety Evaluation

The proposed amendment to the South Texas Project (STP) Technical Specifications (TS) will eliminate the excessive and unnecessary testing of the Standby Diesel Generators (SDG). The changes requested are consistent with the guidance provided in NUREG-1366 and are compatible with STP plant operating experience. An example of this compatibility is the elimination of the Diesel Generator start test now required by Technical Specifications when an Essential Cooling Water Screen Wash Pump is declared inoperable. The Essential Cooling Water Screen Wash Pump is an independently testable component of a supporting system.

TS 3.8.1.1 Actions a. and e. require all operable SDG be started as a demonstration of operability whenever one or more of the offsite AC power sources is declared inoperable. The proposed amendment would eliminate the requirement to demonstrate the operability of an operable SDG whenever an offsite AC power source is determined to be inoperable. The inoperability of an offsite AC power source has no affect on the reliability of a SDG. Deleting this requirement does not affect the design or performance characteristics of the SDGs. Therefore, the SDGs maintain their ability to perform their design function.

TS 3.8.1.1 Actions b. and c. require all remaining operable SDG be started as a demonstration of operability whenever one of the SDG is declared inoperable except for preplanned preventive maintenance or testing. The proposed amendment would revise the testing exclusion to include an inoperable support system and an independently testable component in addition to preplanned preventive maintenance and testing. The addition of these testing exclusions will prevent the need to test the SDG when the source of the inoperability originated in a support system, such as Starting Air or in an independently testable component, such as a relay. The inoperability of these types of items does not reduce the reliability of the effected SDGs to start, once the support system or component is declared operable again. The proposed amendment would also eliminate the testing requirement of the remaining operable SDGs, when a SDG is declared inoperable, unless there is cause to believe a potential common mode failure exists for the remaining SDGs. The normal TS surveillance testing schedule assures that operable SDG(s) are capable of performing their intended safety functions. A failure of one SDG does not reduce the reliability of another, otherwise operable SDG. Deleting this requirement does not affect the design or performance characteristics of the SDGs, once a common mode failure has been dismissed. Therefore, the SDGs maintain their ability to perform their design function.

Technical Specification Surveillance Requirement (SR) 4.8.1.1.2.a.3 requires the start and loading of the Diesel Generator in less than or equal to 10 minutes. The proposed change will remove the time limit and substitute "accordance with manufacturer's recommendation." This will eliminate unnecessary mechanical stress and wear on the diesel engine by allowing a slower loading rate. This will improve the reliability of the diesel generators by reducing the wear on the diesel engine. The 18 month LOOP testing will still require the loading of the diesel generators by the load sequencers.

Technical Specification Surveillance Requirement (SR) 4.8.1.1.2.e.7 requires the start and loading of the Diesel Generator per 4.8.1.1.2.e.6 following the 24 hour run. The proposed change will substitute starting the diesel in accordance with 4.8.1.1.2.a.2 instead. This will eliminate the unnecessary mechanical stress and wear on the diesel engine created by the rapid loading of the generator.

No Significant Hazards Consideration Determination

Houston Lighting & Power (HL&P) has evaluated the proposed amendment against the criteria of 10CFR50.92 as follows:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed change seeks to eliminate the unnecessary testing of an operable Standby Diesel Generator (SDG). Technical Specification (TS) 3.8.1.1 Actions a. and e. require all operable SDGs be started as a demonstration of operability whenever one or more of the offsite AC power sources is declared inoperable. The inoperability of an offsite AC power source has no effect on the reliability of a SDG. Deleting this requirement does not affect the design or performance characteristics of the SDGs. Therefore, the SDGs maintain their ability to perform their design function.

   TS 3.8.1.1 Actions b. and c. require all remaining operable SDGs be started as a demonstration of operability whenever one of the SDG is declared inoperable except for preplanned preventive maintenance or testing. The proposed amendment would expand the testing exclusion to include an inoperable support system and an independently testable component in addition to preplanned preventive maintenance and testing. The proposed amendment would also eliminate the testing requirement of the remaining operable SDGs, when a SDG is declared inoperable, unless there is cause to believe a potential common mode failure exists for the remaining SDGs. The normal TS surveillance testing schedule assures that operable SDG(s) are capable of performing their intended safety functions. A failure of one SDG does not reduce the reliability of another, otherwise operable SDG. Deleting this requirement does not affect the design or performance characteristics of the SDGs, once a common mode failure has been dismissed. Therefore, the SDGs maintain their ability to perform their design function.

2. Does the change create the possibility of a new or different kind of accident from any previously evaluated?

   The elimination of these unnecessary tests does not affect the design bases of the SDGs, or any of the accident evaluations involving the SDGs. The SDGs are designed to provide electrical power to the equipment important for safety during all modes and plant conditions following a loss of offsite power. The test schedule established in accordance with GL 84-15 assures that operable SDGs are capable of performing their intended safety function. Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in a margin to safety?

   Since the proposed change does not affect the design bases, accident analysis, reliability or capability of the SDGs to perform their intended safety function, this change does not involve any reduction in a margin to safety.

Based on the reasoning stated above and the STP evaluation of the amendment request, HL&P has determined that the requested change does not involve a significant hazards consideration.

Implementation Plan

HL&P requests an implementation time of 60 days from the effective date to complete procedures and make appropriate document distribution.