

The Light company

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

September 5, 1990
ST-HL-AE-3561
File No.: G9.06, G20.01
10CFR50.90
10CFR50.92
10CFR51

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

South Texas Project Electric Generating Station
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Proposed Amendment to the
Unit 1 and Unit 2 Technical Specification 4.0.2

Pursuant to 10CFR50.90, Houston Lighting & Power Company (HL&P) hereby proposes to amend its Operating Licenses NPF-76 and NPF-80 by incorporating a proposed change to Technical Specification 4.0.2 for the South Texas Project Electric Generating Station (STPEGS) Units 1 and 2.

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 in the NRC Final Environmental Statement related to operation of 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.

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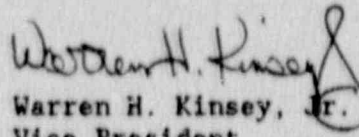
A Subsidiary of Houston Industries Incorporated

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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. M. A. McBurnett at (512) 972-8530 or myself at (512) 972-7921.


Warren H. Kinsey, Jr.
Vice President
Nuclear Generation

GCS/nl

- Attachments:
1. Significant Hazards Evaluation for the Proposed Change to Technical Specification 4.0.2
 2. Proposed Change to Technical Specification 4.0.2 and Bases

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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

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

J. C. Lanier/M. B. Lee
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. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Revised 08/31/90

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

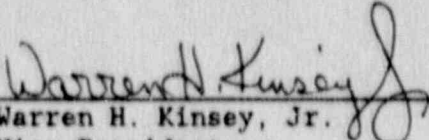
South Texas Project
Units 1 and 2

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Docket Nos. 50-498
50-499

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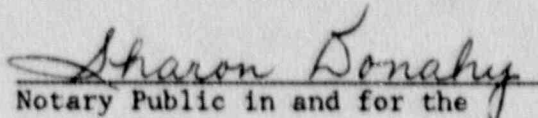
Warren H. Kinsey, Jr. being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed change to the South Texas Project Electric Generating Station Technical Specification 4.0.2; 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

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 4th day of September 1990.





Notary Public in and for the
State of Texas

ATTACHMENT 1
SIGNIFICANT HAZARDS EVALUATION FOR THE
PROPOSED CHANGE TO TECHNICAL SPECIFICATION 4.0.2

SIGNIFICANT HAZARDS EVALUATION FOR THE
PROPOSED CHANGE TO TECHNICAL SPECIFICATION 4.0.2Background

Technical Specification 4.0.2 permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. For example, the plant may be recovering from a transient condition, or surveillance or maintenance activities conflict with performing another surveillance. Technical Specification 4.0.2 also limits extending surveillance intervals so that the combined time interval for three consecutive intervals for a given surveillance cannot exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval.

NRC Generic Letter 89-14 encouraged licensees to propose Technical Specification changes removing the 3.25 limit on extending surveillance intervals. This proposed Technical Specification change conforms with the guidance of Generic Letter 89-14.

Proposed Change

Change Technical Specification 4.0.2 and the bases for Technical Specification 4.0.2 as shown in Attachment 2.

Safety Evaluation

The proposed change is not a physical change or alteration to any plant component or system, or a change to the design or operation of any plant component or system. Additionally, the 3.25 limit of Technical Specification 4.0.2 was not used in the Updated Final Safety Analysis Report (UFSAR) for any Chapter 15 accident analysis.

It is overly conservative to assume that components or systems are inoperable because a surveillance has not been performed within the 3.25 limit of Technical Specification 4.0.2 when performance of the surveillance is otherwise possible within the allowable 25 percent extension limit. The 25 percent extension limit will continue to be used under the proposed change and equipment will continue to be proven operable on a regular basis in accordance with the proposed 4.0.2.

Based on STPEGS experience, implementation of an extended surveillance interval will not impose a significant risk in terms of equipment reliability. Other periodic tests, such as channel checks, have provided adequate assurance of instrument availability. Operational logs and operator walkdowns provide another method to verify operability of components and systems. Where components or systems do not pass a surveillance test criterion, redundant and backup systems exist to ensure that STPEGS remains within its design bases.

Safety Evaluation. Cont'd.

The limit on surveillance extension of 25 percent in the proposed Technical Specification 4.0.2 is based on the nuclear industry's engineering judgment and the recognition that the most probable result of a surveillance being performed is verification of conformance with the surveillance requirements. The 25 percent limit is sufficient to ensure that reliability of equipment verified through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

The proposed change will remove the 3.25 limit on any three consecutive surveillance intervals. This can result in a safety benefit. This proposed change will allow a surveillance to be extended when plant conditions are not suitable for performing a surveillance. Examples of conditions where performance of a surveillance should be avoided are during a plant transient, or under operating conditions where performance of the surveillance could cause a reactor trip. Additionally, safety systems could be out of service due to other surveillances or maintenance activities and performance of the subject surveillance would be undesirable under these conditions. For these plant conditions, needless challenges to plant safety systems with associated risk of reactor trips may be avoided by delaying a surveillance test until redundant equipment is operable. In these cases, the safety benefit of using the 25 percent allowance for extending the surveillance outweighs the benefit of a 3.25 limit on three consecutive surveillance intervals.

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 an accident previously evaluated because the proposed change does not involve a physical change or change the design or operation of a system or component at STPEGS.

The 3.25 limit of Technical Specification 4.0.2 was not used in the UFSAR for any Chapter 15 accident analysis. Therefore, removal of this limit from Technical Specification 4.0.2 cannot increase the probability or consequences of a previously evaluated accident.

The proposed change can have a net safety benefit in that surveillances can be delayed when the plant is in an operational transient or other safety systems are out of service for surveillance testing or maintenance activities. Delaying the subject surveillance until redundant equipment is operable can reduce challenges to safety systems and reduce the risk of associated reactor trips.

Experience at STPEGS has shown that an extended surveillance interval will not impose a significant risk in terms of equipment reliability. Other periodic tests, walkdowns and operational verifications provide another method of assuring continued operability. If a component or system does not pass a surveillance test, redundant and backup equipment is available to perform the safety function.

Therefore, the proposed change does not significantly increase the probability or consequences of a previously evaluated accident.

2. The proposed change does not create the possibility of a new or different accident from any accident previously evaluated. Surveillances performed at STPEGS must continue to use a maximum interval of the surveillance limit plus 25 percent of the limit. The 25 percent limit will ensure that the expected reliability of equipment is not significantly reduced beyond that obtained from the specified surveillance interval.

The purpose of the 3.25 limit was to prevent routine use of the 25 percent limit. The proposed change deleting the 3.25 limit can have a net safety benefit which outweighs the benefit of preventing the routine use of the 25 percent limit.

The design of STPEGS remains unchanged and no physical modification or alteration to the plant or operation of the plant occurs with the proposed change. The proposed change does not modify the surveillance interval. Therefore, the proposed change does not create the possibility of a new or different accident.

3. The proposed change will not involve a significant reduction in a margin of safety. Removal of the 3.25 limit has a positive effect on safety because a surveillance can be delayed when the plant is in an operational transient or when other surveillances or maintenance activities require that redundant safety systems be inoperable. This safety benefit outweighs any benefit derived by limiting any three consecutive surveillances to the 3.25 limit.

Conclusion

HL&P has determined that the proposed change does not involve a significant hazards consideration and that the proposed change can have a net benefit in the safe operation of STPEGS. The NRC has reviewed removal of the 3.25 limit from Technical Specification 4.0.2 and concluded that this change results in a greater benefit to safety than limiting use of the 25 percent allowance to extend surveillance intervals. HL&P requests that the proposed change be approved.