

# The Light company

Houston Lighting & Power

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

July 18, 1994  
ST-HL-AE-4842  
File No.: G09.06  
10CFR50.90  
10CFR50.92

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 Changes to Technical Specifications

Houston Lighting & Power proposes to amend Facility Operating Licenses NPF-76 and NPF-80 for South Texas Project Units 1 and 2 by revising Technical Specification Table 4.3-1, Reactor Trip System Instrumentation Surveillance Requirements, Technical Specification 3.3.4, Turbine Governor Valves and Technical Specification 3.7.1.2, Turbine Driven Auxiliary Feedwater Pump. The purpose of this amendment is to remove one-time amendments that are no longer necessary. In addition, six minor editorial changes are proposed.

Houston Lighting & Power has reviewed the proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, Houston Lighting & Power 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 South Texas Project Nuclear Safety Review Board has reviewed and approved the proposed changes.

The required affidavit, along with a Safety Evaluation and No Significant Hazards Consideration Determination associated with the proposed changes, and the marked-up affected pages of the Technical Specifications are included as attachments to the letter.

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

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*J. F. Groth*  
J. F. Groth  
Vice President,  
Nuclear Generation

Attachment:

1. Affidavit
2. Safety Evaluation and No Significant Hazards Consideration Determination
3. Proposed Technical Specification Changes

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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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

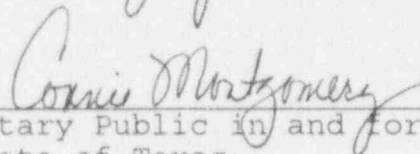
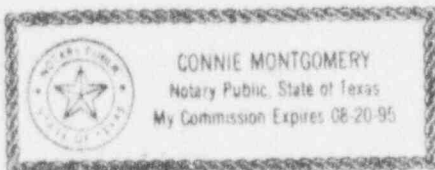
I, J. F. Groth, being duly sworn, hereby depose and say that I am Vice President, Nuclear Generation, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed changes to Technical Specifications 3.3.1, 3.3.4, 3.6.2.2, 3.7.1.2 and 5.1; 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 18 day of July, 1994.



Notary Public in and for the  
State of Texas

ATTACHMENT 2

SAFETY EVALUATION  
AND  
NO SIGNIFICANT HAZARDS  
CONSIDERATION DETERMINATION

### Background

Houston Lighting & Power submitted a request for an emergency Technical Specification change on May 20, 1992. The purpose of the change was to allow plant operation at power until a surveillance on the manual reactor trip circuitry could be performed during a shutdown of each unit. The NRC approved the change and issued License Amendment Nos. 37 (Unit 1) and 28 (Unit 2) on June 2, 1992.

Houston Lighting & Power subsequently performed the required surveillances in the fourth refueling outage for Unit 1 and the third refueling outage for Unit 2.

Houston Lighting & Power submitted a request for a one-time License Amendment on May 26, 1992. The purpose of the one-time amendment was to extend the inspection interval for the Unit 1 turbine valves from 50 months, including the 25% grace period, to approximately 52 months. The extension of the inspection interval was requested to allow inspection of the valves in the fifth refueling outage, which was scheduled to begin in February 1994. The NRC approved the request and issued License Amendment No. 40 on August 18, 1992.

Houston Lighting & Power subsequently performed the required inspections within the normal inspection interval during an unplanned outage in 1993. Houston Lighting & Power did not use the requested extension.

Houston Lighting & Power submitted a request for a one-time License Amendment on December 6, 1993. The purpose of the one-time amendment was to extend the allowed outage time for Unit 1 turbine driven auxiliary feedwater pump from 72 hours to 168 hours. This time extension was requested to accommodate augmented testing for the turbine driven pump during restart of Unit 1 from the 1993 Unit 1 outage. The NRC approved the request and issued License Amendment No. 58 on January 25, 1994.

Houston Lighting & Power successfully tested the Unit 1 turbine driven auxiliary feedwater pump, completed the Unit 1 outage, and returned Unit 1 to power operation in February 1994.



Description of the Proposed Change

In accordance with 10CFR50.90, Houston Lighting & Power proposes the following changes to restore the Technical Specifications to the exact wording prior to the one-time amendments:

1. Delete the footnote in Table 4.3-1. This footnote required verification of the operability of the shunt relay trip circuitry for the manual reactor trip breaker function.
2. Delete the footnote in Technical Specification 3.3.4. This footnote describes extension of the inspection interval for the Unit 1 turbine valves.
3. Delete Action c. in Technical Specification 3.7.1.2. Action c. describes the allowed outage time for the Unit 1 Turbine-Driven Auxiliary Feedwater Pump during restart from the 1993 outage.

In addition, Houston Lighting & Power proposes the following editorial changes:

1. Add the Main Feedwater System limiting condition of operation to the Index.
2. Remove note "(1)" from the "Reactor Coolant Flow--Low" functional unit in the Reactor Trip System Instrumentation table (3.3-1). Note "(1)" refers to Table 3.3-3, Engineered Safety Features Actuation System (ESFAS) Instrumentation and the Reactor Coolant Flow instrument is not an ESFAS instrument.
3. Clarify the wording of the Action statement and Surveillance Requirements for the recirculation fluid pH control system (3.6.2.2). The Limiting Condition for Operation specifies an upper and lower limit for trisodium phosphate, but the Action statement and Surveillance Requirements do not reflect the upper limit as clearly as possible.
4. Add the Unit 2 amendment number, Amendment 36, to the bottom of page 3/4 3-84, Technical Specification 3.3.4.



5. Add a new page for Technical Specification 3.3.3.10, which is not used.
6. Change the term "EOC" to "EOF" on figures 5.1-1, 5.1-3 and 5.1-4. The "Emergency Operations Center" was renamed the "Emergency Operations Facility" to clearly distinguish between the onsite emergency facility and the offsite county and state emergency facilities. This terminology is consistent with the current revision of the Emergency Plan.

### Safety Evaluation

The proposed changes remove the one-time amendments and return the Technical Specifications to the exact wording prior to the one-time amendments. Returning the Technical Specifications to their original wording is considered an administrative change because the actions that were related to the one-time amendments have been completed and the one-time amendments are no longer applicable. Removing the one-time amendments make the Technical Specifications easier for the operators to use by removing action statements that are no longer applicable.

The other proposed changes are purely editorial and do not have adverse safety impact. The editorial changes do not affect the meaning or interpretation of any Technical Specification basis, Limiting Condition of Operation, Action Statement, or Surveillance Requirement.

### No Significant Hazards Considerations

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

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

The changes proposed to remove the one-time amendments return the Technical Specifications to the exact wording prior to the one-time amendments. Returning the Technical Specifications to their original wording is administrative because the one-time amendments are no longer applicable. Hence, removing the one-time amendments would not increase the probability or consequences of an accident. The other changes are purely editorial in nature, hence, would not increase the probability or consequences of an accident.

Based on the above, removal of the one-time amendments from the Technical Specifications will not significantly increase the probability or consequences of an accident.

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

The changes proposed to remove the one-time amendments return the Technical Specifications to the exact wording prior to the one-time amendments. Returning the Technical Specifications to their original wording is administrative because the one-time amendments are no longer applicable. Therefore, removing the one-time amendments would not create the possibility of a new or different kind of accident. The other changes are purely editorial in nature, hence, would not create the possibility of a new or different kind of accident.

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

The changes proposed to remove the one-time amendments return the Technical Specifications to the exact wording prior to the one-time amendments. Returning the Technical Specifications to their original wording is administrative because the one-time amendments are no longer applicable. Therefore, removing the one-time amendments would not involve a significant reduction in a margin to safety. The other changes are purely editorial in nature, hence, would not involve a significant reduction in a margin to safety.

#### Environmental Impact Analysis

The proposed changes to the South Texas Technical Specifications have been reviewed against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration; nor increase the types and amounts of effluents that may be released offsite; nor increase the individual or cumulative occupational radiation exposure. Therefore, the proposed Technical Specification changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement of an Environmental Impact Statement.

#### Implementation Plan

Because the proposed changes are administrative in nature, Houston Lighting & Power does not request approval by a specific date. Houston Lighting & Power requests an implementation time of 31 days from the approval date to change and distribute appropriate documents.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION CHANGES