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

September 6, 1994
ST-HL-AE-4859
File No.: G09.05
10CFR 50.36

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

South Texas Project
Units 1 and 2
Dockets Nos. STN 50-498, STN 50-499
Conversion of the South Texas Project Technical Specifications to the Improved Standard Technical Specification Format. ERRATA

On July 19,1994, Houston Lighting & Power briefed the Nuclear Regulatory Commission on its plan to convert the South Texas Project Technical Specifications to the Improved Standard Technical Specification format. In this meeting, Houston Lighting & Power apprised the Nuclear Regulatory Commission of our intent to make the conversion and develop the necessary analytical documentation to reflect the unique design of the South Texas Project. This letter is to confirm Houston Lighting & Power's decision to implement a Technical Specification Improvement Program at the South Texas Project as follows:

(1) The South Texas Project Units 1 and 2 Technical Specifications (TS) will be converted to the Improved Standard Technical Specifications format (including the bases) as documented in NUREG-1431 and as supplemented by applicable NUREG change packages. This conversion will incorporate the applicable current requirements of the South Texas Project Technical Specifications into the format of the Improved Standard Technical Specifications except as noted below. Houston Lighting & Power will provide the Nuclear Regulatory Commission with appropriate background information and justification for any NUREG requirements not incorporated.

(2) The South Texas Project Units 1 and 2 are 4-loop Westinghouse units with 3-trains of Engineered Safety Features. Since NUREG-1431 was developed for a plant with 2-trains of Engineered Safety Features, it is Houston Lighting & Power's understanding that South Texas Project will be the Lead Plant for 3-train Engineered Safety Features conversion to Improved Standard Technical Specifications. Houston Lighting & Power will address the inconsistencies of NUREG-1431 as it applies to a 3-train Engineered Safety Features plant. The development and approval of Improved Standard Technical Specifications

Surveillance Intervals and Limiting Conditions for Operation and Associated Allowed Outage Times that provide for 1/3, 2/3 and 3/3 trains of inoperable equipment will be an integral part of the development of a Technical Specification for a 3-train plant. Houston Lighting & Power recognizes that all changes must be appropriately supported by the necessary safety and accident analyses. The current Limiting Conditions for Operation, Allowed Outage Times and surveillance intervals in the South Texas Project Technical Specifications are the same as used in the standard 2-train Technical Specifications. These times do not accurately reflect the advantages inherent in the South Texas Project design. Houston Lighting & Power will use probabilistic safety assessment (PSA) and other approved methods to establish appropriate Allowed Outage Times and surveillance intervals.

(3) Houston Lighting & Power plans to perform the Improved Standard Technical Specifications conversion on the following general schedule:

- Complete draft specifications — Oct 1995
- Submit License Amendment Request (LAR) — Feb 1996
- Projected Nuclear Regulatory Commission Approval of Improved Standard Technical Specifications — Dec 1996
- Full implementation of Improved Standard Technical Specifications at South Texas Project — Dec 1997

The Technical Specification Improvement Project will be implemented by a team consisting of individuals with licensing, operations, engineering and training backgrounds to ensure accuracy and to minimize the impact on South Texas Project operating organizations during the implementation process. Houston Lighting & Power looks forward to working with the Nuclear Regulatory Commission staff on this important project and will request a meeting with the Technical Specifications Branch in the near future to further discuss the Technical Specification Improvement Project and schedule. Please contact us if you have any questions in the interim.

J. F. Groth
Vice President,
Nuclear Generation

RSH/esh

c:

Leonard J. Callan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Lawrence E. Kokajko
Project Manager
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001 13H15

David P. Loveless
Sr. Resident Inspector
c/o U. S. Nuclear Regulatory Comm.
P. O. Box 910
Bay City, TX 77404-910

J. R. Newman, Esquire
Newman, Bouknight & Edgar, P.C.
STE 1000, 1615 L Street, N.W.
Washington, DC 20036

K. J. Fiedler/M. T. Hardt
City Public Service
P. O. Box 1771
San Antonio, TX 78296

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

G. E. Vaughn/C. A. Johnson
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61067
Houston, TX 77208

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

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

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

U. S. Nuclear Regulatory Comm.
Attn: Document Control Desk
Washington, D. C. 20555-0001

J. R. Egan, Esquire
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, D.C. 20037