

The Light company

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

May 22, 1995
ST-HL-AE-5089
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
Unit 1 and Unit 2 Technical Specification 3.8.1.1

Houston Lighting & Power Company (HL&P) proposes to amend its Operating Licenses NPF-76 and NPF-80 for the South Texas Project Electric Generating Station (STPEGS), Units 1 and 2, by incorporating the attached proposed change to Technical Specifications Surveillance Requirement 4.8.1.1.2.e.7. The purpose of this amendment is to allow the performance of the 24 hour surveillance test of the diesel generator during power operation.

HL&P has reviewed the attached 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 South Texas Project Electric Generating Station 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.

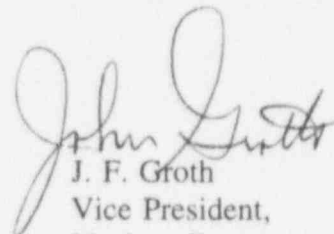
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Project Manager on Behalf of the Participants in the South Texas Project

ADDI

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

If you should have any questions concerning this matter, please call Mr. M. A. McBurnett at (512) 972-7206 or myself at (512) 972-8664.



J. F. Groth
Vice President,
Nuclear Generation

TCK/lf

- Attachment:
1. Affidavit
 2. Safety Evaluation and No Significant Hazard's Consideration Determination
 3. Mark-ups of Proposed Change to Technical Specifications Surveillance Requirement 4.8.1.1.2.e.7.

Houston Lighting & Power Company
South Texas Project Electric Generating Station

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c:

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ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

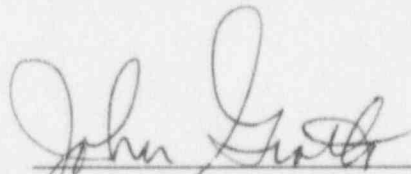
Houston Lighting & Power)
Company, et al.,)

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 revision to proposed changes to 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.

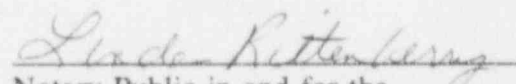


J. F. Groth
Vice President,
Nuclear Generation

STATE OF TEXAS)
)
)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas,
this 22nd day of MAY, 1994.





Notary Public in and for the
State of Texas

ATTACHMENT 2

SAFETY EVALUATION AND NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION FOR PERFORMANCE OF THE 24 HOUR DIESEL GENERATOR SURVEILLANCE AT POWER

Introduction

Houston Lighting & Power proposes a revision to Surveillance Requirement 4.8.1.1.2.e.7 to add a footnote regarding the 24 hour surveillance test of the diesel generators. The proposed change would permit surveillance testing to be performed during power operation. The current Technical Specifications require that this test be performed during shutdowns.

Description

This amendment proposes to add a footnote to the Surveillance Requirement for the 24 hour surveillance test of the diesel generators which will permit surveillance testing of the diesels to be performed during power operation.

Proposed Footnote to 4.8.1.1.2.e.7

This test may be performed during power operation provided that the other two diesel generators are operable.

Safety Evaluation

Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants", requires a demonstration once per refueling cycle that the diesel generators can start and run continuously at full load capability for an interval of not less than 24 hours. This test is currently performed during shutdown to address concerns about causing perturbations to the electrical distribution system that would challenge continued steady state operation and, as a result, plant safety systems. In the test mode the diesel generators are loaded by paralleling with the offsite power system and therefore, the diesel generators by themselves, cannot affect the plant electrical distribution system. Additionally, during the 24 hour test of a diesel generator, no other diesel generator is operated in parallel with the offsite power grid, and the remaining redundant trains are supplied from a separate independent offsite source.

At the South Texas Project, the diesel generators are run monthly during power operation to satisfy Technical Specification requirements. There is no difference between the system lineup for this monthly test of the diesels and the lineup for the 24 hour surveillance test. Performing the 24 hour surveillance test during power operation would not introduce any new operating modes. The provision to require the other two diesel generators to be operable during the test addresses the concerns raised in Information Notice 84-69 regarding the operation of emergency diesel generators connected in parallel with offsite power. If a loss of offsite power occurs during the surveillance test, the diesel generator output breaker will be tripped by the directional over-current relay on the ESF transformer. The ESF bus under-voltage logic will transfer the diesel generator to the emergency mode, and will initiate Mode II (Loss of Offsite Power) operation of the ESF load sequencer to supply emergency loads from the diesel generator. If the diesel were to trip, the other two operable diesels would be available to provide emergency power if necessary.

In the test mode the diesel generators are loaded by paralleling with the offsite power system. If a Loss of Coolant Accident occurs during the surveillance test, the diesel generator output breaker will be opened by a signal from the Solid State Protection System and the preferred offsite source will continue to provide power to the ESF bus. The diesel generator will continue to run in the emergency mode and would be available to automatically supply safety-related loads during any loss of offsite power condition. The test mode to emergency mode transfer is tested once per cycle in accordance with Surveillance Requirement 4.8.1.1.2.e.10. Should offsite power be unavailable, the diesel generator will automatically supply emergency loads. Therefore, the diesel will be available to perform its intended safety function. Furthermore, in the case of unavailability of any one diesel generator, the remaining two generators are capable of feeding the loads necessary for safe shutdown of the plant in the event of a design basis accident or loss of offsite power. Requiring the other two diesels to be operable during the performance of this test provides assurance that emergency power will be available. This will insure that the remaining diesels are available to feed the loads necessary for safe shutdown of the plant and cannot be affected by offsite power disturbances.

Conclusion

The proposed amendment to add a footnote that would permit the 24 hour surveillance test of the diesel generators during power operation is justified. The capability to supply emergency power is not impaired and the operation of the diesel for 24 hours at full load will not result in any perturbation of the plant electrical distribution systems. Therefore, there is reasonable assurance that the operation of the South Texas Project in the proposed manner will not endanger the public health and safety.

Implementation Schedule:

Houston Lighting & Power requests an implementation time of 30 days from the effective date of the approved license amendment to facilitate distribution and to make appropriate changes to plant documents.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Pursuant to 10CFR50.91, this analysis provides a determination that the proposed change to the Technical Specifications described previously, does not involve any significant hazards consideration as defined in 10CFR50.92, as described below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to permit the 24 hour surveillance test of the diesels to be performed during power operation does not increase the chances for a previously analyzed accident to occur. The function of the diesels is to supply emergency power in the event of a loss of offsite power. Operation of the diesels is not a precursor to any accident. Furthermore, the diesel generator being tested will remain operable and will be available to supply emergency loads within the required time. In addition, the two remaining diesel generators will be operable during the test. Consequently, if an offsite disturbance were to occur that affected the operability of the diesel being tested, the two remaining diesels would be capable of feeding the loads necessary for safe shutdown of the plant. This addresses the concerns raised in Information Notice 84-69 regarding the operation of emergency diesel generators connected in parallel with offsite power. In summary, the proposed changes do not adversely affect the performance or the ability of the diesel generators to perform their intended function.

Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment to the 24 hour surveillance test will not affect the operation of any safety system or alter its response to any previously analyzed accident. The diesel will automatically transfer from the test mode if necessary to supply emergency loads in the required time. The test mode is used for the monthly surveillance of the diesel generators as well, therefore, no new plant operating modes are introduced. In the event the diesel fails the surveillance test, it will be declared inoperable and the actions required for an inoperable diesel will be performed. The remaining two diesel generators will be operable and are capable of feeding the loads necessary for safe shutdown of the plant.

Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed amendment will not reduce availability of the diesel generator being tested to provide emergency power in the event of a loss of offsite power. If a loss of offsite power occurs during the surveillance test, the diesel generator output breaker will be tripped by the directional over-current relay on the ESF transformer. The diesel generator will transfer to the emergency mode, and the ESF bus undervoltage logic will initiate Mode II (Loss of Offsite Power) operation of the ESF load sequencer to supply emergency loads from the diesel generator. If a Loss of Coolant Accident occurs during the surveillance test, the diesel generator output breaker will be opened by a signal from the Solid State Protection System and the preferred offsite source will continue to provide power to the ESF bus. The diesel generator will continue to run in the emergency mode and would be available to automatically supply safety-related loads during any loss of offsite power condition. The test mode to emergency mode transfer is tested once per cycle in accordance with Surveillance Requirement 4.8.1.1.2.e.10. In addition, the two remaining generators will be operable during the test. Consequently, if an offsite disturbance were to occur that affected the operability of the diesel being tested, the two remaining diesels would be capable of feeding the loads necessary for safe shutdown of the plant. The time required for the diesel being tested to pick up emergency loads will not be affected by performing the 24 hour surveillance test during power operation.

Therefore, the proposed change will not involve a significant reduction in a margin of safety.