

The Light company

Houston Lighting & Power

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April 15, 1991
ST-HL-AE-3749
File No.: G9.06
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
Technical Specifications 3.3.1 and 3.3.2

Pursuant to 10CFR50.90, Houston Lighting & Power Company (HL&P) hereby proposes to amend its Operating Licenses NPF-76 and NPF-80 by incorporating the attached proposed changes to Technical Specifications 3.3.1 and 3.3.2 for South Texas Project Electric Generating Station (STPEGS) Units 1 and 2. Two tables regarding response times of reactor trip system instrumentation and engineered safety features are to be removed from the STPEGS Technical Specifications. These tables would be placed in Chapter 16 of the STPEGS Updated Final Safety Analysis Report (UFSAR). Surveillance requirements to periodically measure these response times would remain in the Technical Specifications.

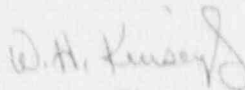
HL&P has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that there is no significant hazards consideration. Additionally, pursuant to 10CFR51 and based on information contained in this submittal and in the Final Environmental Statement Related to the Operation of South Texas Project, Units 1 and 2, HL&P has concluded that the proposed amendment poses no significant radiological or non-radiological impacts, and will not have a significant effect on environmental quality. 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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If you should have any questions concerning this matter, please call
Mr. A. W. Harrison at (512) 972-7298 or myself at (512) 972-7921.



W. H. Kinsey
Vice President,
Nuclear Generation

AMR/amp

Attachments: 1) No Significant Hazards Consideration Determination
2) Proposed Technical Specification Changes
3) Proposed UFSAR Changes

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Docket Nos. 50-498
50-499

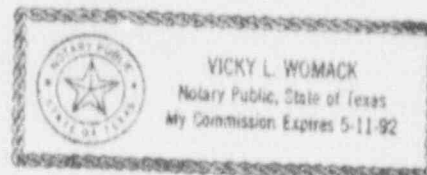
W. H. Kinsey being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed change to the South Texas Project Electric Generating Station Technical Specifications 3.3.1 and 3.3.2; 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.

W. H. Kinsey
Vice President, Nuclear Generation

STATE OF TEXAS

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 15th day of April, 1991.

Notary Public in and for the
State of Texas



ATTACHMENT 1

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Background

Tables 3.3-2 and 3.3-5 list response times for Reactor Trip System Instrumentation and Engineered Safety Features, respectively. These tables contain information on response times; they contain no surveillance requirements or action statements. Removing these tables from Technical Specifications and placing them in the UFSAR would be consistent with the NRC's Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors as published in Federal Register No. 25, dated February 6, 1987, pages 3788-3792. Removal of this administrative information will enable operators to focus more directly on Technical Specification issues related to plant operations.

Three criteria are discussed in the Technical Specification improvement policy. Any part of Technical Specifications which falls under any of these criteria should remain in the Technical Specifications. A discussion of these criteria and how they do not apply to the proposed change follows:

Criterion 1 - Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary:

Tables 3.3-2 and 3.3-5 do not contain values that are displayed on instruments specifically installed to detect excessive reactor coolant system leakage. A list of response times for safety-related instrumentation has no bearing on actual plant operation or implementation of Technical Specifications.

Criterion 2 - A process variable that is an initial condition of a Design Basis Accident (DBA) or Transient Analyses that either assumes the failure of or presents a challenge to the integrity of a fission product barrier:

Response times of reactor trip system instrumentation and engineered safety features are not process variables that have initial values assumed in the Design Basis Accident and Transient Analyses. Also, these times are not variables monitored and controlled during power operations.

Background (cont'd)

Criterion 3 - A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier:

Instrumentation response times are not considered structures, systems, or components that are part of the primary success path of a safety sequence analysis. Also, response times are not support or actuation systems necessary for items in the primary success path to successfully function.

Pursuant to the policy statement, this amendment request contains a clear statement of the basis for the proposed change; the request also has been approved by the Nuclear Safety Review Board. A safety evaluation is also included in this proposal which identifies the controls for the affected tables while they are in the UFSAR. Note that these tables have been deleted from the Technical Specifications issued to Seabrook, Shearon Harris, Vogtle, and Byron/Braidwood plants.

Proposed Change

It is proposed that Table 3.3-2, "Reactor Trip System Instrumentation Response Times," and Table 3.3-5, "Engineered Safety Features Response Times," be removed from the STPEGS - Units 1 and 2 Technical Specifications, and reference to such tables be removed as indicated on the attached proposed Technical Specification changes.

Safety Evaluation

Tables 3.3-2 and 3.3-5 would be removed from the Technical Specifications and placed in Chapter 16 of the UFSAR. Surveillance requirements to periodically measure response times would remain in the Technical Specifications. If a response time is not met, the affected channel would be declared inoperable. The Technical Specifications would also contain the action requirements to be implemented when a channel is declared inoperable. Therefore, sufficient control would remain in the Technical Specifications to ensure response times are periodically checked and instrument operability is maintained. This change would improve the Technical Specifications because with less administrative information, control room operators will be able to focus more directly on issues related to plant operations.

A change to a value listed in the tables moved to Chapter 16 of the UFSAR would require a 10CFR50.59 evaluation to be performed. If the 10CFR50.59 evaluation determines that no unreviewed safety question exists, an on-site review by the Plant Operations Review Committee (PORC) would be performed pursuant to Technical Specification 6.5.1. PORC would then advise the Plant Manager in writing as to whether the change should be approved or disapproved. This process ensures that a thorough review is performed on proposed changes to items relocated to the UFSAR from the Technical Specifications. If an unreviewed safety question is identified, prior NRC approval would be necessary before the change to response times is made.

No Significant Hazards Consideration Determination

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 consequence of an accident previously evaluated.

No change is being proposed to physical systems in the plant; information on response times for reactor trip system instrumentation and engineered safety features would be relocated to the UFSAR. Changes to UFSAR tables regarding response times would be made pursuant to 10CFR50.59, thereby ensuring proper safety considerations. Therefore, the proposed change does not involve a significant increase in the probability or consequence of an accident previously evaluated.

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

The proposed change would not affect the design, configuration, or method of operation of the plant. Transferring tables from the Technical Specifications to the UFSAR is an administrative change with no effect on plant operations. Any changes to response times would be evaluated pursuant to 10CFR50.59 and safety questions, if any, would be adequately handled through that process. Therefore, since no actual changes to safety systems would be made, the proposed change does 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 the margin of safety.

No Significant Hazards Consideration Determination (cont'd)

Existing Technical Specification operability and surveillance requirements would not be reduced by the proposed change, and the change would not affect a safety limit or a Limiting Condition for Operation. Changes to tables regarding response times would be handled pursuant to 10CFR50.59, reviewed by PORC, and then approved by the Plant Manager. Changes which involve an unreviewed safety question will be reviewed and approved by the NRC prior to implementation. Therefore, no margins of safety are significantly reduced by the proposed change.

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