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

South Texas Project Electric Generating Station
Unit 1
Proposed Temporary Waiver of
Compliance to Specification 3.7.4

HL&P requests a one time Temporary Waiver of Compliance to Specification 3.7.4 for the STPEGS Unit 1 Essential Cooling Water System (ECW) to allow A Train of ECW to remain out of service for up to 96 hours for the repair of a crack in the 6" flange fitting on the inlet to the Standby Diesel Generator intercooler piping upstream of the expansion bellows and a crack in the expansion bellows. The cracks are being repaired by replacing the expansion bellows and the affected flange with hard pipe and a new flange. HL&P has evaluated the effect of ECW A Train being out of service for more than 72 hours and determined that continuing plant operation for the necessary time is consistent with protecting the public health and safety. The approval of this Temporary Waiver of Compliance will preclude an unnecessary transient and associated stresses on Unit 1 components and systems during shutdown and restart evolutions.

HL&P decided to repair the cracks in a scheduled A Train outage beginning January 7, 1992. HL&P has initiated repairs of the cracks and initially expected the repairs to be completed within 65 hours. However, during the repairs it was determined that additional piping was required to be drained to prevent valve leakby from affecting the repair. This draining and subsequent refilling adds additional outage time. Therefore, the repair duration may require ECW A train to be out of service for up to 96 hours, which exceeds the allowed outage time of 72 hours in STPEGS Technical Specification 3.7.4.

There is no significant safety impact relative to extending the outage time. The other two trains of ECW will be operable and can mitigate the design basis accident (DBA). Additionally since only one train of ECW is necessary for safe shutdown of the plant and mitigation of all accidents but the very unlikely DBA, there is adequate redundancy with the availability of the two other ECW trains.

Review of the STPEGS Probabilistic Safety Assessment (PSA) shows that a one time increase in the allowed outage time from 72 hours to 96 hours will not significantly affect the calculated core damage frequency (CDF) at STPEGS. The percent increase in CDF has been conservatively estimated at 0.1%, which is well within the margin of error for the CDF and is considered insignificant.

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HL&P's review of the requested extension shows that there are no significant hazards considerations:

1) It does not involve a significant increase in the probability or consequences of an accident previously evaluated. Availability of the other two trains of ECW is adequate for accident mitigation, since unavailability of one train is already considered in STPEGS accident analyses.

2) It does not create the possibility of a new or different kind of accident from any accident previously evaluated. No changes in mode of operation of ECW are proposed, or in the configuration of the system. No change to the system as evaluated in the STPEGS safety analysis is proposed.

3) It does not involve a significant reduction in the margin of safety. As discussed above, the review of the STPEGS PSA shows the increased outage time for this waiver of compliance is an insignificant contribution to risk at STPEGS.

There is no potential for significant environmental consequences from extending the ECW A train outage time. There is no accident analysis impact, and the nature of the work does not involve release of radiological or non-radiological effluents or adversely affect systems associated with control of effluents.

HL&P's Plant Operation Review Committee has reviewed the proposed extension and found it to be acceptable.

If you have any questions, please contact Mr. A. W. Harrison at (512) 972-7298, or me at (512) 972-7921.

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