

The Light company

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

January 16, 1992

ST-HL-AE-3980

File No.: G21.01

G21.02

10CFR50.36

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

South Texas Project
Unit 1
Docket No. STN 50-498
Request for a Temporary Waiver of Compliance
from the Provisions of Technical Specification 3.7.14

Reference: Correspondence from G. E. Vaughn to Document Control Desk
dated February 1, 1990 (ST-HL-AE-3283)

Houston Lighting & Power Company (HL&P) requests a temporary waiver of compliance from the provisions of Technical Specification 3.7.14. Specifically, HL&P requests the waiver so that the allowed outage time (AOT) for one train of Essential Chilled Water System can be extended by an additional 72 hours. The Unit is presently in a limiting condition for operation which expires at 0200 on January 17, 1992.

Unit 1 of the South Texas Project (STP) is presently in Mode 1 at 100% power. The differential pressure flow switches for the Train B 150 ton and 300 ton Chillers are inoperable. HL&P is investigating the cause so that repairs can be made as soon as possible. Per TS 3.7.14, with only two of the three Essential Chilled Water System Loops operable, three loops are to be restored to operable status within 72 hours or the affected unit should be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours. The extension of an additional 72 hours is requested to allow adequate time for troubleshooting and performing the necessary repairs without the need to shutdown the unit.

Extending the Chilled Water allowed outage time is addressed in a proposed amendment to the Unit 1 and Unit 2 Technical Specifications (referenced above). That request provides justification for extending the allowed outage time for up to 10 days based on the STP Probabilistic Safety

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A Subsidiary of Houston Industries Incorporated

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Assessment (PSA). The referenced correspondence shows the extension to a 10 day AOT results in a change in core damage frequency of 0.7%, which is small in comparison to the uncertainty in estimating core damage frequency. (Note that the 0.7% change is based on a proposed permanent change.) In reviewing the previously submitted change, HL&P concluded that there are no significant radiological or non-radiological impacts associated with the proposed action.

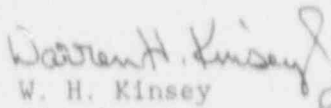
This request for a temporary waiver of compliance is consistent with protecting the health and safety of the public. HL&P believes that continued operation is a safer course of action than shutting down the plant and imposing the accompanying stress cycles on equipment. Also, continued power generation is in the interest of the public.

Granting the waiver will not involve a consideration of significant hazards:

- 1) The proposed waiver results in a change in the STP core damage frequency of less than 0.7%. No alterations to equipment are proposed, nor are there any changes in accident analysis assumptions. Consequently, there is no significant increase in the probability or consequences of an accident previously evaluated.
- 2) There are no alterations to equipment or different operating configurations being proposed, nor are accident analysis assumptions being changed. Consequently, the request does not create the possibility of a new or different kind of accident.
- 3) Two other trains of Essential Chilled Water are still operable and only one is required to shutdown the plant. Consequently, the request does not result in a significant reduction in the margin of safety.

The STPEGS Plant Operations Review Committee has concurred with this request for a temporary waiver of compliance.

If there are any questions, please contact Mr. A. W. Harrison at (512) 972-7298 or me at (512) 972-7205.


W. H. Kinsey
Vice President,
Nuclear Generation

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Houston Lighting & Power Company
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