

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

June 16, 1992

ST-HL-AE-4059

File No.: G20.02.01

G2.06

10CFR50.90

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

South Texas Project Electric Generating Station  
Units 1 and 2

Docket Nos. STN 50-498 and 50-499

Revised Proposed Amendment to the Unit 1 and Unit 2

Technical Specifications to Delete Technical Specification Table 5.7-1

- References: 1) ST-HL-AE-2880 dated December 7, 1988  
2) ST-HL-AE-3114 dated May 31, 1989  
3) ST-HL-AE-3884 dated October 25, 1991

Pursuant to 10CFR50.90, Houston Lighting & Power Company (HL&P) hereby 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 the STPEGS Technical Specifications (TS). The proposed change consists of deleting Technical Specification Table 5.7-1, "Component Cyclic or Transient Limits", which is implemented at STPEGS by plant procedure in accordance with the requirements in the UFSAR. This implementing procedure was described in References 1 and 2.

By Reference 3 HL&P submitted a proposed Amendment for the deletion of Technical Specification Table 5.7-1. This submittal supersedes Reference 3 and includes the incorporation of staff comments. The incorporation of staff comments do not change the intent or the basis of the proposed Technical Specification.

The Significant Hazards Evaluation for the deletion of Technical Specification 5.7-1 is included as Attachment 1, and the proposed Technical Specification is included in Attachment 2.

HL&P has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it involves no significant hazards considerations. The basis for this determination is provided in the attachments. In addition, based on the information contained in this submittal and the NRC Final Environmental Assessment for STPEGS Units 1 and 2, HL&P has concluded that, pursuant to 10CFR51, there are no significant radiological or nonradiological impacts associated with the proposed action and the proposed license amendment will not have a significant effect on the quality of the environment.

TSC\91-259\001

A Subsidiary of Houston Industries Incorporated

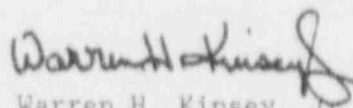
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The STPEGS Nuclear Safety Review Board has reviewed and approved the proposed changes.

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

If the NRC should have any questions concerning this matter, please contact Mr. A. W. Harrison at (512) 972-7298 or myself at (512) 972-7921.



Warren H. Kinsey, Jr.  
Vice President  
Nuclear Generation

SDP/

- Attachments:
1. Significant Hazards Evaluation for the Deletion of Technical Specification Table 5.7-1
  2. Mark-ups of Proposed Changes to Technical Specifications

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter )

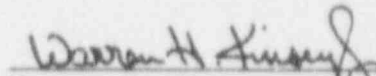
Houston Lighting & Power )  
Company, et al., )

Docket Nos. 50-498

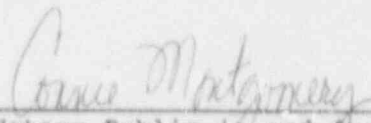
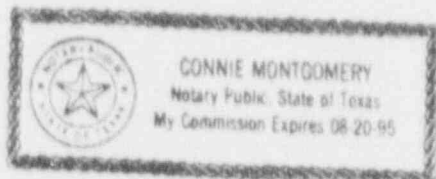
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South Texas Project )  
Units 1 and 2 )AFFIDAVIT

Warren H. Kinsey, Jr. 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 proposed amendment to the Unit 1 and Unit 2 Technical Specifications; 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.

Warren H. Kinsey, Jr.  
Vice President, Nuclear GenerationSTATE OF TEXAS )  
)  
)

Subscribed and sworn to before me, a Notary Public in and for The State of Texas this 16th day of June, 1992.

Notary Public in and for the  
State of Texas

Houston Lighting & Power Company  
South Texas Project Electric Generating Station

ST-HL-AE-4059  
File No.: G20.02.01, G2.06  
Page 4

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Revised 10/11/91

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ATTACHMENT 1  
SIGNIFICANT HAZARDS EVALUATION FOR THE  
DELETION OF TECHNICAL SPECIFICATION Table 5.7-1

SIGNIFICANT HAZARDS EVALUATION FOR THE  
DELETION OF TECHNICAL SPECIFICATION Table 5.7-1

Background

In the process of reviewing the STP Unit 2 draft Technical Specifications, the staff requested justification for the adequacy of Table 5.7-1 as guidance for monitoring plant transients to assure cyclic or transient limits are not exceeded. This request was based on apparent discrepancies between Technical Specification 5.7-1 and STP UFSAR Table 3.9-8. STP UFSAR Table 3.9-8 lists more transients than does Technical Specification 5.7-1. HL&P committed to establish a program to identify past occurrences of fatigue significant transients and to reconcile the discrepancies between the UFSAR Table 3.9-8 and Technical Specifications Table 5.7-1 to assure that fatigue significant transients are identified via procedure.

HL&P has augmented the Technical Specification transient limits by issuing Plant Engineering Procedure OPEP02-ZE-0001, Revision 1 which implements the transient cycle counting limits for STP. The procedure lists those relevant transients found in UFSAR Table 3.9-8, along with those found in the Technical Specifications. This procedure provides controls to track cyclic/transient occurrences to ensure that components are maintained within the design limits.

Proposed Change

The proposed change will delete Technical Specification Table 5.7-1. Plant procedure OPEP02-ZE-0001 provides controls to track relevant UFSAR Table 3.9-8 and Technical Specification Table 5.7-1 cyclic/transient occurrences to ensure that components are maintained within the design limits.

Safety Evaluation

The list of cyclic and transient conditions in the South Texas Units 1 and 2 Technical Specification Table 5.7-1 Component Cyclic or Transient limits is less comprehensive than the list of conditions in UFSAR Table 3.9-8 Summary of Reactor Coolant System Design Transients. The purpose of Table 5.7-1 is to ensure the cyclic and transient limits of the reactor coolant system are within the design bases in accordance with ASME Code requirements. However, since Table 5.7-1 is not comprehensive, the Technical Specification does not achieve its intended purpose. The procedure used for monitoring cycles is comprehensive in tracking the accumulation of relevant transient events listed in both the Technical Specification and the UFSAR. Consequently, elimination of Specification 5.7-1 would be administrative and have no safety impact on STPEGS. Elimination of the specification would be of benefit in that the specification provides no ACTION guidance in the case cycles are exceeded. Whereas the procedure provides for evaluating fatigue accumulation and engineering reviews to determine appropriate corrective action.



Safety Evaluation Cont'd.

Procedure OPEP02-ZE-0001 provides the mechanism for tracking the conformance of the actual plant operating transients with those of the design basis. The technical basis for this procedure is a plant specific engineering evaluation which is consistent with the applicable limits in the Updated Final Safety Analysis Report. Since the UPSAR applicable limits will be maintained in accordance with the requirements of 10CFR50.59, this proposed change is administrative in nature.

The removal of Technical Specification Table 5.7-1 from Technical Specifications has no impact on plant operation or safety. No safety-related equipment, safety function, or plant operations will be altered as a result of this proposed change.

This proposed change to the Technical Specifications is considered to be an improvement in Technical Specifications and is consistent with the NRC stated policy for improving Technical Specifications (52FR3788, February 6, 1987).

Determination of No Significant Hazards

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

- (1) The proposed change does not involve a significant increase in the probability or consequences of accidents previously evaluated.

The removal of cyclic or transient limits from the STPEGS Technical Specifications has no influence or impact on the probability or consequences of any accident previously evaluated. The change is administrative in nature. The cyclic or transient limits will still be monitored in the operation of the STPEGS plants.

- (2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This change is administrative in nature and involves no change to the design bases or operating procedures. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Determination of No Significant Hazards Cont'd.

- (3) The proposed change does not result in a significant reduction in the margin of safety.

The margin of safety is not affected by the removal of cyclic or transient limits from the Technical Specifications. The margin of safety presently provided by current Technical Specifications remains unchanged. Appropriate measures exist to control the values of these cyclic or transient limits. Therefore, the proposed changes are administrative in nature and do not impact the operation of STPEGS in a manner that involves a reduction in the margin of safety. The proposed amendment continues to require operation within the cyclic or transient limits. Appropriate actions to be taken when or if limits are violated remain unchanged.

Conclusion

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists. This guidance includes examples (51FR7750) of the type of amendments that are considered not likely to involve significant hazards considerations. The change proposed is similar to the examples of administrative changes identified in 51FR7750. Additionally, the proposed change is consistent with the NRC policy for improving Technical Specifications (52FR3788) and the proposed change is consistent with 10CFR50.36 and 10CFR50.59.