

The Light company

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

May 1, 1996
ST-HL-AE-5313
File No.:G21.02
10 CFR 50.12
10 CFR 50 App.J
10 CFR 50.90
10 CFR 50.92
10 CFR 51

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Proposed Incorporation of Option B to 10 CFR 50 Appendix J
and Proposed Amendment to South Texas Project
Technical Specifications

The South Texas Project proposes to incorporate Option B of 10 CFR 50, Appendix J for Units 1 and 2, and proposes to amend the South Texas Project Technical Specifications 4.6.1.1, 3.6.1.2, 4.6.1.2, 3.6.1.3, 4.6.1.3, 4.6.1.7.2, 4.6.1.7.3, Bases 3/4.6.1.2, 3/4.6.1.3, and add Administrative Controls new Section 6.8.3.j. The proposed amendment and incorporation of Option B of 10 CFR 50, Appendix J are in accordance with NEI 94.01, Revision 0, (July 26, 1995); Regulatory Guide 1.163 (September 1995); ANSI/ANS-56.8-1994; and the Nuclear Regulatory Commission, 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Final Rule.

The South Texas Project has provided attachments giving a description of the license amendment request and the necessary justifications to support changes required to implement Option B of 10 CFR 50, Appendix J. Attachment 2 summarizes proposed changes to the current South Texas Project Technical Specifications required to implement Option B of 10 CFR 50, Appendix J and identifies the Exemptions to be retained from 10 CFR 50, Appendix J, Option A. Attachment 3 provides the Safety Evaluation and No Significant Hazards Consideration Determination for the proposed changes. Attachment 4 is the 10 CFR 50, Appendix J, Option B Implementation Plan and Attachment 5 is the marked up Technical Specifications.

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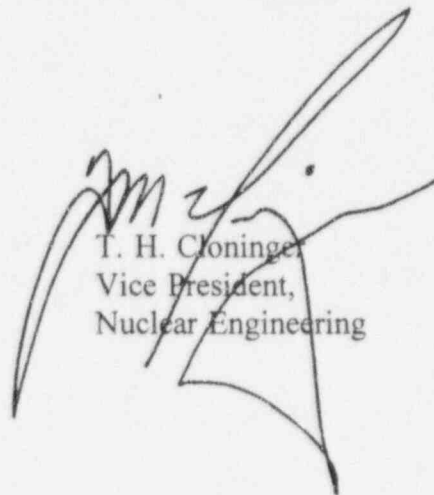
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The South Texas Project has reviewed the proposed amendment to Technical Specifications and proposed incorporation of Option B of 10 CFR 50, Appendix J in accordance with the criteria of 10 CFR 50.12 and 10 CFR 50.92, and believes the proposed changes are acceptable. In addition, the South Texas Project Plant Operations Review Committee and Nuclear Safety Review Board have considered and concur with this application. The South Texas Project has determined that the proposed amendment satisfies the criteria of 10 CFR 51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment. The State of Texas has been apprised of the proposed change.

The South Texas Project has begun the revision process for the Containment Leakage Rate Testing Program procedure. This procedure will be approved and ready to be effective by July 1, 1996. Prompt action to review this application is requested in order for appropriate planning for implementation of Option B of 10 CFR 50, Appendix J and the Containment Leakage Rate Testing Program in early July, 1996. The South Texas Project requests an implementation period of 30 days from the approval date of this proposed amendment.

If you have any questions, please call me at 512-972-8787, or call H. R. Pate at 512-972-7787.



T. H. Cloninger
Vice President,
Nuclear Engineering

HRP/lf

- Attachment:
1. Affidavit
 2. Description of Proposed Changes
 3. Safety Evaluation and No Significant Hazards Consideration Determination
 4. Implementation Plan
 5. Technical Specification Mark-Ups

Houston Lighting & Power Company
South Texas Project Electric Generating Station

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ATTACHMENT 1

AFFIDAVIT

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

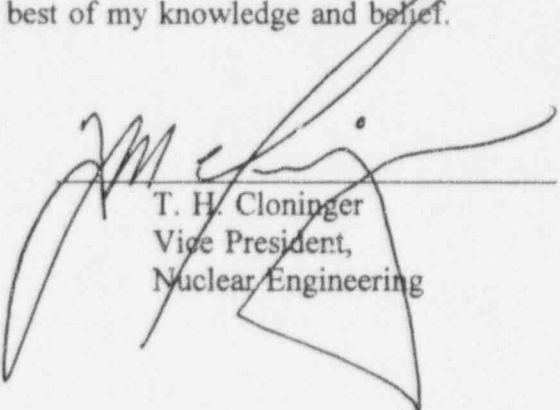
Houston Lighting & Power)
Company, et al.,)

Docket Nos. 50-498
50-499

South Texas Project)
Units 1 and 2)

AFFIDAVIT

I, T. H. Cloninger, being duly sworn, hereby depose and say that I am Vice President, Nuclear Engineering, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed incorporation of Option B of 10 CFR 50, Appendix J, and the proposed changes to the South Texas Project Technical Specifications; 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.

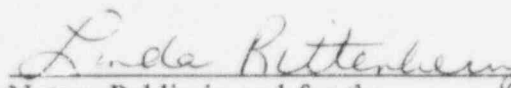

T. H. Cloninger
Vice President,
Nuclear Engineering

STATE OF TEXAS)

COUNTY OF MATAGORDA)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this
1st day of May, 1996.




Notary Public in and for the
State of Texas

ATTACHMENT 2

DESCRIPTION OF PROPOSED CHANGES

BACKGROUND INFORMATION

In September, 1995 the Nuclear Regulatory Commission issued NUREG-1493, "Performance-Based Containment Leak-Test Program." This document contained findings that supported extending the containment leak-testing intervals. With Regulatory Guide 1.163, September, 1995 the NRC amended its regulations to provide a performance-based option, Option B, for leakage-rate testing of containments of light-water-cooled nuclear power plants. Regulatory Guide 1.163 endorses with exceptions NEI 94-01, Revision 0, dated July 26, 1995, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" and ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements". Licensees may voluntarily comply with this Option B as an alternative to the current requirements in Appendix J. The South Texas Project (STP) proposes to revise its Technical Specifications and Containment Leakage Rate Testing Program to implement this new performance based option of 10 CFR 50, Appendix J. The proposed changes have been prepared in accordance with the guidance provided in Regulatory Guide 1.163, NEI 94-01 and ANSI/ANS 56.8-1994.

Option B of 10 CFR 50, Appendix J will allow an extended test interval for the Integrated Leakage Rate Test (ILRT) to once per ten years versus the current requirement of three within a ten year period. Generally Local Leakage Rate Test (LLRT) will be extended to a five year test interval versus the current two year interval. Both the ILRT and LLRT extended test intervals are based upon satisfactory performance of two "As Found" tests (test performance prior to any maintenance on the component).

Based on component history, STP expects approximately 75% of its containment barriers to meet the criteria to be placed on extended intervals. The "As Found" data will be available after the Unit 1 sixth refueling outage and after the Unit 2 fifth refueling outage.

DESCRIPTION OF PROPOSED CHANGES

STP proposes to incorporate Option B of 10 CFR 50, Appendix J for Units 1 and 2. The attachments provide a description of the license amendment request and the necessary justifications to support changes required to implement Option B of 10 CFR 50, Appendix J. Attachment 2 summarizes proposed changes to the current South Texas Project Technical Specifications required to implement Option B of 10 CFR 50, Appendix J. Attachment 3 provides the safety evaluation and the No Significant Hazards Consideration Determination for the proposed changes. Attachment 4 is the Option B Implementation Plan and Attachment 5 is the marked up Technical Specifications.

1. Exemptions

STP license contains the following exemptions to 10 CFR 50, Appendix J, Option A, which are to be retained as documented below:

- a. Allow testing specific valves in the opposite direction (TOWARD CONTAINMENT) as allowed in FSAR Table 6.2.6-3.
- b. Allow the performance of a short duration ILRT using Total Time Analysis in accordance with Bechtel Corporation Topical Report BN-TOP-1, Revision 1. (Letter ST-AE-HL-93420, Mr. Lawrence Kokajko, USNRC, to Mr. William Cottle, Houston Lighting and Power Company, dated May 18, 1993.)
- c. Airlock overall air leakage test not required at the end of a period when containment integrity is not required based on no maintenance performed on the airlock that could effect the airlock sealing capability. (NUREG-0781, Supplement 3, Section 6.2.6 to the STP Safety Evaluation Report, dated May 1987, and NUREG-0781, Supplement 6, Appendix BB, Table 6 to STP Safety Evaluation Report dated December 1988)

2. Primary Containment Integrity

STP Technical Specification Surveillance Requirement (SR) 4.6.1.1, restates the requirements of 10 CFR 50, Appendix J for periodic leakage rate testing for Type B and C tests and therefore must be changed. These requirements are specified in Option B of 10 CFR 50, Appendix J, and encompassed within the Containment Leakage Rate Testing Program. SR 4.6.1.1.c has been deleted since leakage limits are addressed in SR 4.6.1.2 and the Containment Leakage Rate Testing Program.

3. Containment Leakage

STP Technical Specification Limiting Condition for Operation (LCO) 3.6.1.2, restates the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for Type A, B, and C tests and therefore must be changed. These requirements are specified by Option B of 10 CFR 50, Appendix J, and encompassed within the Containment Leakage Rate Testing Program. LCO 3.6.1.2. has been rewritten to direct the operator to the Containment Leakage Rate Testing Program. LCOs 3.6.1.2a and b have been deleted. SR 4.6.1.2 has been rewritten to direct the operator to the Containment Leakage Rate Testing Program. STP proposes adding the Containment Leakage Rate Testing Program description in Technical Specification Administrative Controls new Section 6.8.3.j.

4. Containment Air Locks

Technical Specification LCO 3.6.1.3.b and SRs 4.6.1.3.a and b restate requirements of 10 CFR 50, Appendix J for periodic leakage rate testing for primary containment air locks and therefore must be changed in conjunction with the changes necessitated by Option B of 10 CFR 50, Appendix J. These requirements are encompassed within the Containment Leakage Rate Testing Program. LCO 3.6.1.3.b has been deleted and SR 4.6.1.3.a has been rewritten to direct the operator to the Containment Leakage Rate Testing Program. SR 4.6.1.3b has been deleted. STP proposes adding the Containment Leakage Rate Testing Program description in Technical Specification Administrative Controls new Section 6.8.3.j.

5. Containment Ventilation System

SRs 4.6.1.7.2 and 4.6.1.7.3 state the requirements for the test frequency of containment purge supply and exhaust valves and therefore must be changed in conjunction with the changes necessitated by Option B of 10 CFR 50, Appendix J. These requirements are encompassed within the Containment Leakage Rate Testing Program. SRs 4.6.1.7.2 and 4.6.1.7.3 have been rewritten to direct the operator to the Containment Leakage Rate Testing Program. STP proposes adding the Containment Leakage Rate Testing Program description in Technical Specification Administrative Control new Section 6.8.3.j.

6. Technical Specification Bases

Changes to the Bases regarding Technical Specifications 3/4.6.1.2, Containment Leakage and 3/4.6.1.3, Containment Air Locks have been proposed. The proposed changes reflect the aforementioned changes to the LCOs and SRs, as previously described. The proposed changes are in accordance with NEI 94.01, Revision 0, Regulatory Guide 1.163 (September, 1995) and ANSI/ANS-56.8-1994.

7. Administrative Controls

STP proposes adding a Containment Leakage Rate Testing Program as Section 6.8.3.j to the Technical Specifications Administrative Control.

6.8.3.j Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September, 1995.

Peak calculated primary containment internal pressure for the design basis loss of coolant accident, Pa is 41.2 psig.

The maximum allowable primary containment leakage rate, La, is 0.3% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is ≤ 1.0 La. During the first unit start-up following testing in accordance with this program, the leakage rate acceptance criteria are ≤ 0.60 La for the combined Type B and Type C tests, and ≤ 0.75 La AS-LEFT and ≤ 1.0 La As-Found for Type A tests.
- b. Air lock testing acceptance criteria for the overall air lock leakage rate is ≤ 0.05 La when tested at \geq Pa.

The provisions of SR 4.0.2 do not apply to the test intervals specified in the Containment Leakage Rate Testing Program.

The provisions of SR 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

ATTACHMENT 3

SAFETY EVALUATION OF PROPOSED CHANGES

AND

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATIONS

SAFETY EVALUATION

1. Primary Containment Integrity

Compliance with the requirements of 10 CFR 50, Appendix J, are still assured. The Containment Leakage Rate Testing Program will contain specifics concerning STP compliance with the requirements of 10 CFR 50, Appendix J, Option B and the exemptions that have been approved by the NRC. The referenced Containment Leakage Rate Testing Program establishment, implementation, and maintenance is required by the proposed addition of the program description in Technical Specification Administrative Controls new Section 6.8.3.j. Specific exemptions will be controlled in the FSAR and the Containment Leakage Rate Test Program. The relocation of various LCOs and acceptance criteria to the Administrative Controls and the Containment Leakage Rate Testing Program is consistent with NUREG 1431 and the guidance provided by the NRC in Mr. Christopher I. Grimes', Chief Technical Specifications Branch, letter to Mr. Modeen, NEI, dated November 2, 1995.

2. Containment Leakage

Compliance with the requirements of 10 CFR 50, Appendix J, are still assured. The Containment Leakage Rate Testing Program will contain specifics concerning STP compliance with the requirements of 10 CFR 50, Appendix J, Option B and the exemptions that have been approved by the NRC. The referenced Containment Leakage Rate Testing Program establishment, implementation, and maintenance is required by the proposed addition of the program description in Technical Specification Administrative Controls new Section 6.8.3.j. Specific exemptions will be controlled in the FSAR and the Containment Leakage Rate Testing Program. The appropriate cross-reference to the Containment Leakage Rate Testing Program within SR 4.6.1.2 ensures sufficient information is retained within the Technical Specifications. The relocation of various LCOs and acceptance criteria to the Administrative Controls and the Containment Leakage Rate Testing Program is consistent with NUREG 1431 and the guidance provided by the NRC in Mr. Grimes' letter, dated November 2, 1995, to NEI. 10 CFR 50 Appendix J, Option B allows longer intervals between leakage tests based on performance trends but does not increase the leakage acceptance criteria. La is still limited to 0.3 wt%/day. By referencing the Containment Leakage Rate Testing Program in LCO 3.6.1.2 ACTION, the point at which ACTION is required is increased from .75 La to 1.0 La. This makes the specification consistent with the intent of having margin between an AS-LEFT leakage of $\leq .75$ La and maintaining operability with ≤ 1.0 La.

3. Containment Air Locks

The requirements of 10 CFR 50, Appendix J, Option B revise the surveillance requirements regarding containment air locks. Under the revised rule, containment air locks shall be tested at an internal pressure of not less than a specified pressure prior to a pre-operational Type A test. Subsequent periodic tests shall be performed at a frequency of at least once per 30 months. When containment integrity is required, air lock door seals should be tested within 7 days after each containment access. For periods of multiple containment entries where the air lock doors are routinely used for access more frequently than once every 7 days (e.g., each shift or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

The relocation of the details that comprise this LCO to Technical Specification Administrative Controls is consistent with NUREG 1431. The leakage acceptance criteria are relocated to new Section 6.8.3.j. This change is administrative in nature and does not adversely affect the safe operation of the facility.

The specific requirements specified in SR 4.6.1.3 are encompassed within Technical Specification Administrative Controls new Section 6.8.3.j. The Containment Leakage Rate Testing Program as defined within new Section 6.8.3.j provides reference to Option B of 10 CFR 50, Appendix J. Consistent with the intent of NUREG-1431, surveillance procedural details are inappropriate for inclusion within the Technical Specifications. Such details are redundant to those specified within Option B of 10 CFR 50, Appendix J. The appropriate cross-reference to the Containment Leakage Rate Testing Program within SR 4.6.1.3 ensures sufficient information is retained within the Technical Specifications. Because the proposed changes are consistent with the current plant configuration, NUREG-1431 and Option B of 10 CFR 50, Appendix J, the proposed changes do not adversely affect existing plant safety margins.

4. Containment Ventilation System

The requirements of 10 CFR 50, Appendix J, Option B revise the surveillance requirements regarding containment purge supply and exhaust valves. Under the final rule, containment purge valves tests shall be performed at a frequency of at least once per 30 months in accordance with ANSI/ANS 56.8-1994 Section 3.3.4.

The relocation of the details that comprise this LCO to Technical Specification Administrative Controls is consistent with NUREG 1431. The leakage acceptance criteria are relocated to new Section 6.8.3.j. This change is administrative in nature and does not adversely affect the safe operation of the facility.

The specific requirements specified in SR 4.6.1.3 are encompassed within Technical Specification Administrative Controls new Section 6.8.3.j. The Containment Leakage Rate Testing Program as defined within new Section 6.8.3.j provides reference to Option B of 10 CFR 50, Appendix J. Consistent with the intent of NUREG-1431, surveillance procedural details are inappropriate for inclusion within the Technical Specifications. Such details are redundant to those specified within Option B of 10 CFR 50, Appendix J. The appropriate cross-reference to the Containment Leakage Rate Testing Program within SR 4.6.1.3 ensures sufficient information is retained within the Technical Specifications. Because the proposed changes are consistent with the current plant configuration, NUREG-1431 and Option B of 10 CFR 50, Appendix J, the proposed changes do not adversely affect existing plant safety margins.

5. **Technical Specification Bases**

The proposed changes to the Technical Specification Bases reflect the aforementioned changes. The changes to the Bases are administrative in nature.

6. **Administrative Controls**

STP proposes adding the Containment Leakage Rate Testing Program to Technical Specification Administrative Controls new Section 6.8.3.j. The Containment Leakage Rate Testing Program is defined in accordance with the requirements of 10 CFR 50.54(o) and Option B to 10 CFR 50, Appendix J as modified by approved exemptions. The program is in accordance with the guidelines contained within Regulatory Guide 1.163, as modified with approved exemptions.

The changes include definitions regarding the peak calculated primary containment internal pressure for the design basis Loss Of Coolant Accident (LOCA), Pa. The changes also include definitions regarding the maximum allowable primary containment leakage rate, La. Leakage rate acceptance criteria for the Type A, Type B, and Type C tests are also specified. Leakage rate acceptance criteria for primary containment air locks are also specified. Clarification regarding the provisions of Technical Specification SR 4.0.2 are included. This clarification is provided to ensure that the 25% maximum allowable surveillance extension is not applicable to the test frequencies specified in the Containment Leakage Rate Testing Program. Clarification is also provided to ensure that the provisions of SR 4.0.3 are included. This clarification is provided to ensure that a 24-hour period is allowed in order to rectify any potential missed surveillance.

NO SIGNIFICANT HAZARDS CONSIDERATION

STP has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of STP in accordance with the proposed amendment will not:

- 1) **Involve a significant increase in the probability or consequences of an accident previously evaluated because of the following:**

10 CFR 50, Appendix J has been amended to include provisions regarding performance based leakage testing requirements (Option B). Option B allows plants with satisfactory Integrated Leak Rate Testing (ILRT) performance history to extend the Type A testing interval from three tests in ten years to one test in ten years. For Type B and Type C tests, Option B allows extended testing interval based on the leak rate test history of each component. To be consistent with the requirements of 10 CFR 50, Appendix J, Option B, STP proposes to include appropriate changes to the Technical Specifications that incorporate the necessary revisions associated with 10 CFR 50, Appendix J, Option B.

The proposed amendment represents the conversion of current Technical Specification requirements to maintain consistency with those requirements specified by 10 CFR 50, Appendix J, Option B. The proposed changes are consistent with the current safety analyses. Implementation of these changes will provide continued assurance that specified parameters associated with containment integrity will remain within acceptance limits, and will not significantly increase the probability or consequences of a previously evaluated accident.

Some proposed changes represent minor relaxations in current Technical Specification requirements, but are based on the requirements specified by Option B of 10 CFR 50, Appendix J. Changes are consistent with the current safety analyses and determined to represent sufficient requirements for the assurance and reliability of equipment assumed to operate in the safety analyses, and provide continued assurance that specified parameters associated with containment integrity remain within their acceptance limits. These changes will not significantly increase the probability or consequences of a previously evaluated accident.

The systems affecting containment integrity related to this proposed amendment request are not assumed in any safety analyses to initiate any accident sequence. The probability of any accident previously evaluated is not increased by

this proposed amendment. The proposed changes to Technical Specification LCOs or SRs maintain an equivalent level of reliability and availability for all affected systems. The proposed amendment does not increase the consequences of any accident previously evaluated.

There is no change to the consequences of an accident previously evaluated because maintaining leakage within the analyzed limit assumed for any associated accident analyses does not adversely affect either the on-site or off-site dose consequences resulting from an accident. There is no adverse impact on the probability of accident initiators. There is no significant increase in the probability of any previously analyzed accident. A plant specific risk-based analysis of Appendix J performed for STP indicates the containment penetration leakage dose rate contribution to the total dose rate in person-rem is insignificant.

2) **Create the possibility of a new or different kind of accident from any accident previously evaluated because:**

10 CFR 50, Appendix J, Option B specifies, in part, that a Type A test which measures both the containment system overall integrated leakage rate at containment pressure and system alignments assumed during a large break LOCA, and demonstrates the capability of primary containment to withstand an internal pressure load, may be conducted at an interval based on the performance of the overall containment system. The acceptable leakage rates are specified in the plant's Technical Specifications. For Type B and Type C tests, intervals are proposed based on the performance history of each component. Acceptance criteria for each component is based upon demonstration that the sum leakage rates at design basis pressure conditions for applicable penetrations, is within the limit specified in the Technical Specifications.

The proposed amendment represents the conversion of current Technical Specification requirements to maintain consistency with those requirements specified in 10 CFR 50, Appendix J, Option B. The proposed changes are consistent with the current safety analyses. Some minor relaxations in current Technical Specification requirements, associated with containment integrity are based on generic guidance provided in Option B, NEI 94-01 and ANSI/ANS 56.8, 1994. These changes do not involve revisions to the design of the station. Some of the changes may involve revision in the testing of components; however, these are in accordance with the STP current safety analyses and provide for appropriate testing or surveillance that are consistent with 10 CFR 50, Appendix J, Option B. The proposed changes will not

introduce new failure mechanisms beyond those already considered in the current safety analyses.

The proposed amendment has been reviewed for acceptability considering similarity of system or component design affecting containment integrity. No new modes of operation are introduced by the proposed changes. Surveillance requirements are changed to reflect corresponding changes associated with Option B of 10 CFR 50, Appendix J and improvements in technique or interval of leak rate testing performance. The proposed changes maintain, at minimum, the present level of operability of any system that affects containment integrity. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The associated systems that affect leak rate integrity related to the proposed amendment, are not assumed in any safety analysis to initiate any accident sequence. The proposed surveillance requirements for any affected systems are consistent with the current requirements specified within the Technical Specifications and are consistent with the requirements of Option B of 10 CFR 50, Appendix J. The proposed surveillance requirements maintain an equivalent level of reliability and availability of all affected systems and therefore, does not increase the consequences of any previously evaluated accident.

3) Involve a significant reduction in the margin of safety because:

The provisions specified in Option B of 10 CFR 50 Appendix J allow changes to Type A, Type B, and Type C test intervals based upon the performance of past leak rate tests. The effect of extending containment leakage rate testing intervals has a corresponding increase in the likelihood of containment leakage. The degree to which intervals can be extended is a direct function of the potential effect to existing safety margins and the public health and safety that can occur due to an increased likelihood of containment leakage. 10 CFR 50 Appendix J, Option B allows longer intervals between leakage tests based on performance trends but does not increase the leakage acceptance criteria. L_a is still limited to 0.3 wt%/day. By referencing the Containment Leakage Rate Testing Program in LCO 3.6.1.2 ACTION, the point at which ACTION is required is increased from .75 L_a to 1.0 L_a . This makes the specification consistent with the intent of having margin between an AS-LEFT leakage of $\leq .75 L_a$ and maintaining operability with $\leq 1.0 L_a$.

Changing Appendix J test intervals from those currently

provided in the Technical Specification to those provided in 10 CFR 50, Appendix J, Option B, slightly increases the risk associated with Type A, Type B, and Type C specific accident sequences. Historical data suggests that increasing the Type C test interval can slightly increase the associated risk; however, this is compensated by the corresponding risk reduction benefits associated with reduction in component cycling, stress, and wear associated with increased test intervals. When considering the total integrated risk which includes all analyzed accident sequences, the risk associated with increasing test intervals is negligible. A plant specific risk-based analysis of Appendix J performed for STP indicates the containment penetration leakage dose rate contribution to total dose rate in person-rem is insignificant.

STP proposes to revise the Technical Specifications to be consistent with those provisions specified in Option B of 10 CFR 50, Appendix J. The proposed changes are consistent with the STP current safety analyses. These proposed changes do not involve revisions to the design of the station. The proposed changes will maintain the same level of reliability of equipment associated with containment integrity assumed to operate in the safety analysis, and provide continued assurance that specified parameters affecting plant leak rate integrity will remain within acceptance limits. The proposed changes provide continued assurance of leakage integrity of containment without adversely affecting the public health and safety and will not significantly reduce existing safety margins. Plant specific risk-based analysis indicates sufficient technical justification exists to further extend the limits beyond those allowed by Option B.

The proposed amendment to the Technical Specifications implements present requirements, or the requirements in accordance with the guidelines set forth in Option B of 10 CFR 50, Appendix J. NUREG-1493, "Performance-Based Containment Leak-Test Program," served as the technical basis for Option B. STP performed a plant specific risk-based analysis of containment penetration leakage dose utilizing the same methodology used in NUREG-1493. The analysis indicates the containment penetration leakage dose rate contribution to the total dose rate in person-rem is insignificant. This plant specific analysis serves to validate the applicability of the proposed changes for STP. The proposed changes have been approved by the NRC, are applicable to STP, maintain necessary levels of system or component reliability affecting containment integrity, and do not involve a significant reduction in the margin of safety.

The performance-based approach to leakage rate testing concludes the impact on public health and safety due to revised testing intervals is negligible. The proposed amendment will not reduce availability of systems associated with containment integrity when required to mitigate accident conditions; therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for limiting safety system settings or a significant relaxation of the bases for LCOs. Therefore, based on the guidance provided in the Federal Register and criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ENVIRONMENTAL ASSESSMENT

STP has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. The proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22 (c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types of any effluent that may be released off-site. This request does not involve a significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT 4
IMPLEMENTATION PLAN

STP will incorporate 10 CFR 50, Appendix J, Option B into the Containment Leakage Testing Program. STP will comply with performance oriented and risk-based approaches including performance based requirements and the following supporting documents:

10 CFR 50 Appendix J, Option B,
"Primary Reactor Containment Leakage Testing for
Water-Cooled Power Reactors";

U. S. Nuclear Regulatory Commission Regulatory Guide 1.163,
"Performance-Based Containment Leak-Test Program";

NEI 94-01 Revision 0, July 26, 1995,
"Nuclear Energy Institute Industry Guideline for
Implementing Performance-Based Option of 10 CFR Part 50,
Appendix J"

ANSI/ANS-56.8-1994,
"American National Standard for Containment System Leakage
Testing Requirements."

STP has begun the revision process for the Containment Leakage Rate Testing Program procedure. This procedure will be approved and ready to be effective for use during the implementation period request for this proposed amendment.

STP began performing "AS FOUND" Type B and C tests and will be in a position to begin extending LLRT test intervals on selected penetrations in the near future.

STP developed a Reactor Containment Building Inspection procedure. Unit 2 has been inspected in accordance with this procedure during the fourth refueling outage.

For scheduling and/or ALARA concerns, STP may elect not to perform "AS FOUND" testing on components. These components will not be placed on extended test intervals until they meet the "AS FOUND" criteria referenced in NEI 94-01, Revision 0.

STP requests an implementation period of 30 days from the approval date of this proposed amendment.