

The Light company

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

January 28, 1997
ST-HL-AE-5547
File No.: G20.02.01
10 CFR 50.90,
10 CFR 50.92,
10 CFR 51

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

South Texas Project
Units 1 & 2
Docket No. STN 50-498 and STN 50-499
Unit 1 and Unit 2 Technical Specification 6.2.3

The South Texas Project proposes to amend its Operating Licenses NPF-76 and NPF-80 for the South Texas Project Electric Generating Station, Units 1 and 2, by incorporating the following changes to Technical Specification 6.2.3. The proposed change would remove reference to the Independent Safety Engineering Group (ISEG) from current Technical Specifications. All details and functions of ISEG will be relocated to the Updated Final Safety Analysis Report (UFSAR).

The required affidavit (Attachment 1), along with a Safety Evaluation and No Significant Hazards Consideration Determination (Attachment 2) associated with the proposed changes, the marked up affected pages of the Technical Specifications (Attachment 3), and the marked up pages of the UFSAR (Attachment 4) are included as attachments to this letter.

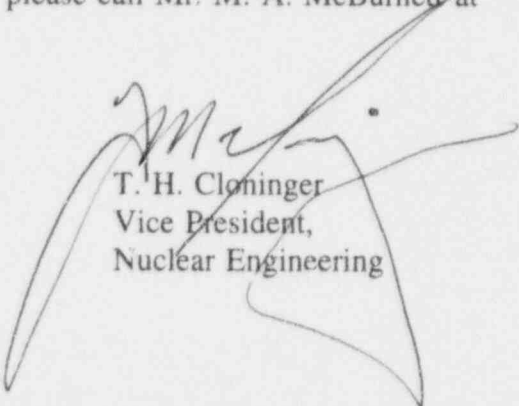
The South Texas Project has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. In addition, the South Texas Project has determined that the proposed amendment satisfies the criteria of 10CFR51.22(c)(9) for categorical exclusion from the requirement of an environmental assessment. The South Texas Project Electric Generating Station Nuclear Safety Review Board has reviewed and approved the proposed changes.

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If you should have any questions concerning this matter, please call Mr. M. A. McBurnett at (512) 972-7206 or myself at (512) 972-8787.



T. H. Cloninger
Vice President,
Nuclear Engineering

MLF/

- Attachment:
1. Affidavit
 2. Safety Evaluation and No Significant Hazards Consideration Determination
 3. Mark-ups of Proposed Changes to Technical Specification 6.2.3
 4. Mark-ups of Proposed Changes to UFSAR 13.4.2.2

Houston Lighting & Power Company
South Texas Project Electric Generating Station

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U. S. Nuclear Regulatory Commission
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ATTACHMENT 1

AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

South Texas Project, et al.,

South Texas Project Unit 1 & 2

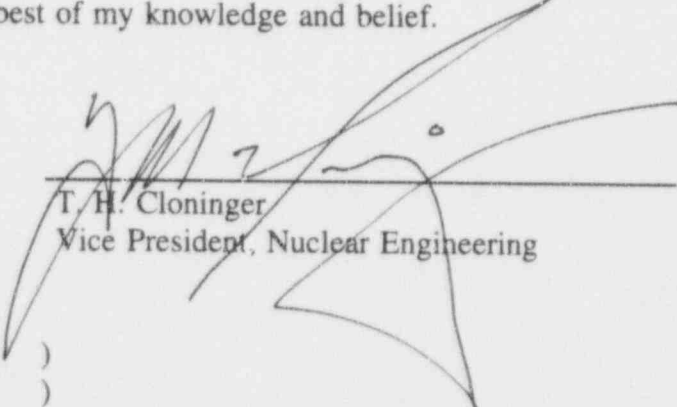
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Docket Nos. 50-498

50-499

AFFIDAVIT

I, T. H. Cloninger, being duly sworn, hereby depose and say that I am Vice President, Nuclear Engineering, of the South Texas Project; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached revision to proposed change to Technical Specification 6.2.3; 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

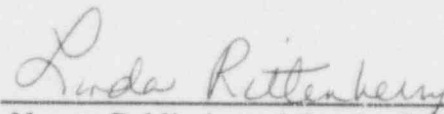
STATE OF TEXAS

COUNTY OF *Matagorda*

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Subscribed and sworn to before me, a Notary Public in and for the State of Texas,
this *28th* day of *January*, 1997.





Notary Public in and for the State of Texas

ATTACHMENT 2

**SAFETY EVALUATION
AND
NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION**

SAFETY EVALUATION
AND
NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION

BACKGROUND

The Independent Safety Engineering Group (ISEG) functions to examine key elements of Plant Operations for improvement in the area of Plant Safety. These elements include but are not limited to Unit Operating Characteristics, NRC issuances, industry advisories, and Licensee Event Reports. ISEG is responsible for maintaining an independent verification of unit activities to ensure that these activities are performed correctly, and that human errors are reduced to as low a level as practical. The ISEG reports to the Director, Quality. Records of activities are forwarded each calendar month to the Chairman, Nuclear Safety Review Board.

PROPOSED CHANGE DESCRIPTION

The proposed change will relocate the details of Technical Specification 6.2.3 from the Administrative Controls section of Technical Specifications and place these details in South Texas Project's Updated Final Safety Analysis Report (UFSAR). Currently UFSAR Section 13.4.2.2 describes ISEG, but not in the detail as current Technical Specifications. UFSAR Section 13.4.2.2 will be revised to show that level of detail (Attachment 4). Also, Manager, Nuclear Safety Review Board title has been changed to Chairman, Nuclear Safety Review Board to reflect the actual title.

SAFETY EVALUATION

The Independent Safety Engineering Group (ISEG) maintains an independent and objective viewpoint on unit activities. Areas for improvement in performance and human factors are identified. Reports of these findings are forwarded each month to the Chairman, Nuclear Safety Review Board.

ISEG's removal from Technical Specifications does not render any changes to any existing plant philosophies or safety analysis. This change is administrative only. The details previously listed in Technical Specifications will now be listed in the South Texas Project Updated Final Safety Analysis Report (UFSAR). The UFSAR is subject to the change control process in the Administrative Controls Section of the Technical Specifications, and any changes will be evaluated per 10CFR50.59. Therefore no accidents previously evaluated, no new or different kinds of accidents are created, and no reduction in the margin of safety will be allowed without prior NRC approval.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

- 1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed changes move details from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR). The changes do not result in any hardware or operating procedure changes. The details being removed from the Technical Specifications are not assumed to be an initiator of any analyzed event. The UFSAR, which will contain the removed Technical Specification details, will be maintained using the provisions of 10CFR50.59 and is subject to the change control process in the Administrative Controls Section of the Technical Specifications. Since any changes to the UFSAR will be evaluated per 10CFR50.59, no increase in the probability or consequences of an accident previously evaluated will be allowed without prior NRC approval. Therefore, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change moves detail from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR). The changes will not alter the plant configuration (no new or different type of equipment will be installed) or make changes in methods governing plant operation. The changes will not impose different requirements, and adequate control of information will be maintained. The changes will not alter assumptions made in the safety analysis and licensing basis. Therefore, the changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **The proposed change does not involve a significant reduction in a margin of safety.**

The proposed changes move detail from Technical Specifications to the Updated Final Safety Analysis Report (UFSAR). The changes do not reduce the margin of safety since the location of details has no impact on any safety analysis assumptions. In addition, the detail transposed from the Technical Specifications to the UFSAR are the same as the existing Technical Specification. Since any future changes to the UFSAR will be evaluated per the requirements of 10CFR50.59, no reduction in a margin of safety will be allowed without prior NRC approval.

IMPLEMENTATION SCHEDULE

The South Texas Project requests an implementation time of 30 days from the effective date of the approved license amendment to facilitate distribution and to make appropriate changes to plant documents.