

The Light company

Houston Lighting & Power

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March 18, 1988
ST-HL-AE-2562
File No.: G20.02.01
10CFR50.90

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

South Texas Project Electric Generating Station
Unit 1

Docket No. STN 50-498

Proposed Technical Specifications Slave Relay Test Exemptions

Pursuant to 10CFR50.90, Houston Lighting and Power (HL&P) hereby proposes to amend its Operating License, NPF-71, by incorporating the attached proposed change to the Technical Specifications, NUREG-1255, for South Texas Unit 1. We would appreciate your expeditious review of this matter. This change is not considered an item necessary to be reviewed for approval prior to the Full Power Commissioner's Briefing.

Specifically, HL&P is proposing to delete Table 4.3-2, Note 5 and add to Note 4 of Table 4.3-2 slave relay quarterly test exemptions for the Accumulator Discharge Isolation Valves and the 48-inch Purge Supply and Exhaust Valves.

Discussion

The slave relays employed in the STP Solid State Protection System (SSPS) are used in other recently licensed Westinghouse plants. The performance history for these relays, based upon information available, has been excellent. Additionally, the slave relays proposed for these lengthened test intervals are identical in design to the other slave relays in the SSPS. Because a relatively small percentage of the total number of relays fall into the lengthened testing interval category, there is a high probability that a failure due to a generic design defect of application will be discovered during the quarterly tests of the other slave relays.

Technical Specification 3.5.1 requires that for Modes 1, 2 and 3, with Pressurizer Pressure above 1000 psig, the Accumulator Discharge Isolation Valves be opened with power removed. Due to the circuitry of the slave relay associated with the Accumulator Discharge, slave relay testing through the final actuation device cannot be accomplished unless the valves are closed. It should be noted that ASME Section XI Accumulator Discharge Check Valve Flow and Leak tests relief requests were previously granted so that HL&P is now

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only required to partially stroke these valves during Cold Shutdown, with disassembly every refueling. As such, it will now not be necessary to shut the isolation valves in order to test the check valves. Therefore, the only reason HL&P would have to close the isolation valve would be to perform the slave relay test itself.

Technical Specification 3.6.1.7 requires that for Modes 1 through 4 the 48-inch Containment Shutdown Purge Supply and Exhaust Isolation Valves be closed and sealed closed. Again, due to the circuitry of the slave relay associated with the 48-inch Purge Supply and Exhaust Valves, it would be necessary to open these valves in order to perform the slave relay test through the actuation device. Also, ASME Section XI flow and leak tests relief was granted so that these valves are now tested during refueling. Performing the slave relay test is not desirable from both an operational or transient standpoint. In addition, since the purge valves must be declared inoperable during performance of the test, STP would be forced into a 1-hour and 4-hour Technical Specification ACTION statement unnecessarily.

Significant Hazards Considerations

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an Operating License for a facility involves a no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve significant reduction in the margin of safety. HL&P has reviewed the proposed change and determined that:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because it does not constitute a change to plant systems which are part of FSAR accident analysis either in failure/accident initiation mode or accident mitigation mode.
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because it does not constitute a change to plant systems which are part of FSAR accident analysis either in failure/accident initiation mode or accident mitigation mode.
3. The proposed amendment does not involve a significant reduction in the margin of safety as defined in bases for the subject Technical Specifications for the reasons provided in the discussion above. Additionally, this proposed change will allow STP to remain in compliance with the Limiting Condition for Operation for both Technical Specifications 3.5.1 and 3.6.1.7 without perturbing the plant and placing it in a less desirable operating configuration.

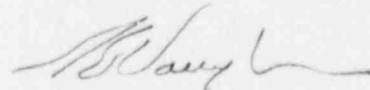
Based on the information contained in this submittal and the NRC Final Environmental Assessment for South Texas Units 1 and 2, HL&P has concluded that pursuant to 10CFR51, there are no significant radiological or non-radiological impacts associated with the proposed action and that the proposed license amendment will not have a significant effect on the quality of the human environment.

The South Texas Project Unit 1 Nuclear Safety Review Board has reviewed and approved the attached proposed revision to the Operating License.

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

Pursuant to the requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.00.

If you should have any questions on this matter, please contact Ms F. A. White at (512) 972-7985.



G. E. Vaughn
Vice President
Nuclear Plant Operations

GEV/FAW/djc

Attachments: Proposed changes to Table 4.3-2, Notes 4 and 5

Check No. 00110569

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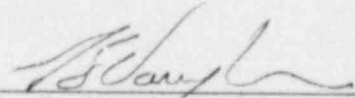
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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| In the Matter |) | Operating License NPF-71 |
| |) | Docket No. 50-498 |
| Houston Lighting & Power |) | |
| Company, et al., |) | |
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| South Texas Project |) | |
| Unit 1 |) | |

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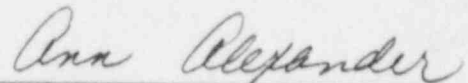
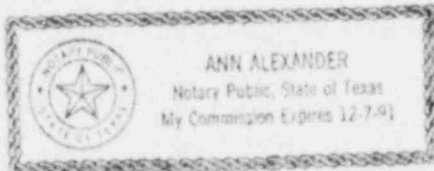
G. E. Vaughn, being dully sworn, hereby deposes and says that he is Vice President, Nuclear Plant Operations, of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed Technical Specifications amendment regarding Quarterly Slave Relay Test Exemptions; 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.



G. E. Vaughn
Vice President
Nuclear Plant Operations

STATE OF TEXAS)

Subscribed and sworn to before me, a Notary Public in and for
State of Texas this 18 day of March 1988.



Notary Public in and for the
State of Texas