



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

Withhold Attachment 2 from public disclosure under 10 CFR 2.390

August 27, 2007
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10CFR50.90
10CFR50.48
STI: 32166017

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
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Rockville, MD 20852-2738

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
License Amendment Request for Deviation from Fire Protection Program Requirements

Pursuant to 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) hereby requests a licensee amendment for deviation from STPNOC Fire Protection Program Requirements. Specifically, a deviation from certain technical requirements of Section III.G.2 of Appendix R to 10CFR50, as documented in the STPNOC Fire Hazards Analysis Report, is requested regarding the use of operator manual actions in lieu of meeting circuit separation protection. The attached safety evaluation demonstrates that no significant hazards will result from this change.

The STPNOC Plant Operations Review Committee has reviewed and concurred with the proposed change.

In accordance with 10 CFR 50.91(b), STPNOC is notifying the State of Texas of this request for license amendment by providing a copy of this letter and its attachments. A No Significant Hazards Consideration Determination is provided in Attachment 1.

Upon approval of this request, the approved deviation will be documented in the Fire Hazards Analysis Report. There are no other commitments in this request.

It is requested that this license amendment request be approved by August 15, 2008 with a 60 day implementation period to provide time to revise STPNOC licensing documents.


STPNOC requests that Attachment 2 be withheld from public disclosure in accordance with 10 CFR 2.390.

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NRR

If there are any questions regarding this amendment request, please contact Ken Taplett at (361) 972-8416 or me at (361) 972-7867.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/27/07


David W. Rencurrel
Vice President,
Engineering & Strategic Projects

Attachments:

1. Description of Change and Safety Evaluation
2. Annotated Fire Hazards Analysis Report Page (**NOT FOR PUBLIC DISCLOSURE**)

cc:

(paper copy)

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Attachment 1

Description of Change and Safety Evaluation

Description of Change and Safety Evaluation

1.0 Summary Description

This evaluation supports a request to amend Operating Licenses NPF-76 and NPF-80 for the South Texas Project (STP), Units 1 and 2.

The proposed change would revise the Operating Licenses to deviate from certain STP Fire Protection Program Requirements. The reason for this amendment is to allow the performance of operator manual actions to achieve and maintain safe shutdown in the event of a fire in lieu of meeting circuit separation protection requirements of 10 CFR 50, Appendix R, Section III.G.2. The proposed schedule is to allow the Nuclear Regulatory Commission (NRC) sufficient time to review and approve this amendment request and for STP to revise licensing documents.

2.0 Detailed Description

During the last triennial inspection (Reference 6.1) of the STP Fire Protection Program (FPP), the South Texas Project Nuclear Operating Company (STPNOC) received a non-cited violation for crediting operator manual actions to mitigate the effects of fire damage in lieu of providing physical protection. The inspection report cited the example of not physically protecting from fire damage the cables associated with the charging pump suction valve from the Refueling Water Storage Tank (RWST), CV-MOV-0112C. The inspectors found that manual operator action was reasonable and could be performed within the analyzed time limits. This proposed amendment is needed to resolve this issue.

The STP FPP is described in the Final Hazards Analysis Report (FHAR). Although STP is not an Appendix R plant, the FHAR states that STP will meet the requirements of 10 CFR 50, Appendix R, Section III.G.2 unless a deviation from those requirements has been approved by the NRC. STP requests approval to deviate from these requirements, as specified below, and allow the performance of operator manual actions in lieu of protecting cables from fire damage that could prevent the operation or cause mal-operation of safe shutdown functions. The operator manual actions provide an equivalent level of protection and assure that the unit can be safely shutdown in the event of a fire.

The specific deviation from Section III.G.2 applies to Fire Area 32 only. This request is to allow the performance of operator manual actions to de-energize and manually open charging pumps suction valve CV-MOV-0112C (Train C) to align the charging pumps suction to the Refueling Water Storage Tank (RWST) and to de-energize and manually close the Volume Control Tank (VCT) outlet valve CV-MOV-0112B (Train B) to the charging pumps suction. These actions will ensure that adequate boron concentration is available for reactivity control and to ensure that adequate inventory control is maintained for safe shutdown.

Plant procedure addresses fires in areas of the plant that do not require alternative shutdown. For Fire Area 32, procedure directs operators to perform operator manual actions outside of the control room to re-align charging pumps suction from the VCT to the RWST. Specifically, operators are directed to de-energize and manually open the charging pumps suction valve CV-MOV-0112C to align the charging pumps suction to the RWST and to de-energize and manually close the VCT outlet valve CV-MOV-0112B to the charging pumps suction. The cables for the motor operators to valves CV-MOV-0112C and CV-MOV-0112B are located in Fire Area 32. Cables for the redundant train charging pumps suction motor-operated valve from the RWST (CV-MOV-113B) and the redundant VCT outlet valve (CV-MOV-0113A) to the charging pumps suction are also located in Fire Area 32. The redundant cables do not meet any of the methods for physical protection accepted by Section III.G.2 of Appendix R. The safe shutdown function met by the operator manual actions is the assurance that makeup is available to the plant for reactivity control and inventory control. The FHAR currently does not credit the use of operator manual actions for a fire in Fire Area 32 as an approved deviation from the requirements of Section III.G.2 of Appendix R.

The annotated FHAR page affected by this proposed change is provided in Attachment 2.

Upon approval of this request, the approved deviation will be documented in the STP FHAR.

3.0 Technical Evaluation

Fire Area 32: Fire Area 32 is a multi-elevation area in the Mechanical Electrical Auxiliary Building composed of several fire zones. The safe shutdown strategy in response to a fire in this fire area relies on the charging pump¹ 1B (2B) for plant makeup capability. Operator actions to realign the charging pumps suction by providing a gravity drain from the RWST is required for plant makeup. The fire safe shutdown thermal-hydraulic analysis requires that these actions be performed within two hours of a reactor trip initiated in response to a fire. This ensures that makeup is available to the plant to support reactivity control and inventory control for plant cooldown.

Cables for each of the two charging pump suction motor-operated valves are routed through Fire Area 32 without meeting the train separation requirements of the STP FPP. The redundant C Train vs. B Train cables are separated by a 3-hour rated floor (60' Mechanical Auxiliary Building (MAB) floor). This floor has unrated penetrations in it although they are not within 30 feet of the cable areas. The C Train's cables are routed in Fire Area 32 zone 122 and have fire suppression and detection in this zone. The B Train's cables are routed through Fire Area 32 Zone 134 (29' MAB) which is located two floors below and transverses the 10' MAB to the location of the B Train valve in Fire Area 26. The closest route that these cables for these trains come within is greater than 70 feet with moderate intervening combustibles. These cables are separated by 3-hour rated floors with non-rated penetrations. See page 12 for a graphical view. Therefore, this separation does not meet the intent of III.G.2 separation (solid 3-hour barrier or full area suppression).

¹Charging pump 1B is in Unit 1 and charging pump 2B is in Unit 2.

Procedure directs an operator to de-energize and manually open CV-MOV-0112C and to de-energize and manually shut CV-MOV-0112B from areas located outside Fire Area 32 and inside Train C Switchgear Room. The areas where the valve is de-energized and manually operated do not require traversing Fire Area 32.

Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire:

Draft NUREG-1852, "Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire," (Reference 6.2) provides the latest published technical guidance to assist in determining that operator manual actions are feasible and can be performed reliably in response to fire. The NUREG report provides criteria for analyzing the feasibility and reliability of operator manual actions to achieve safe shutdown. The following provides the STP analysis of these criteria for justifying the operator manual actions specified in this request in lieu of meeting circuit separation protection requirements.

Criterion 1: Analysis Showing Adequate Time Available to Perform the Actions to Address Feasibility

Adequate time must be available to allow the actions to be diagnosed and executed in order to achieve and maintain hot shutdown following a single fire. The plant's thermal-hydraulic response must be analyzed to validate that the actions ensure that the safety functions can be performed.

The diagnosis for the actions to re-align the charging pumps suction includes detection of the fire and an assessment whether the nature of the fire could jeopardize the achievement of safe shutdown capability. Once this assessment is made, the control room uses a procedure to direct the actions to be taken by safe shutdown operators at a location remote from the control room. Diagnostic instrumentation in the control room remains free from fire damage to ensure that the action was successful. The thermal-hydraulic analysis requires that the actions be performed within two hours following a reactor trip to support reactivity control and inventory control for cooldown.

A comprehensive Fire Detection, Control, and Alarm System is installed throughout the plant. The primary operation of this system is automatically governed by a series of local control panels located throughout the plant. The Fire Protection System control panels monitor the general plant area fire detectors and monitor and/or control all of the special hazard fire protection systems to ensure their continuous availability. Alarms are transmitted from the local panels to the fire protection data acquisition system in the main control room. The fire detectors for Fire Area 32 are served by this system.

The plant procedure provides the operator a table to readily determine the fire area that a detector is alarming. Ionization detection is provided in the zones through which the subject cables are routed in Fire Area 32 to provide early warning of a fire.

Upon detection of a fire, plant procedures direct the operator to assess whether the nature of the fire has reached the point of jeopardizing the capability of systems and components in the fire area to support achieving fire safe shutdown. If the assessment determines that the fire has reached this point, plant procedures direct the performance of specific steps to ensure that the plant is placed in a hot standby condition that can transition to cold shutdown. Plant procedures specifically direct the actions (i.e. de-energize and manually open CV-MOV-0112C and de-energize and manually close CV-MOV-0112B) to be performed. The operator has two hours following a reactor trip to perform these actions.

Times to complete key steps toward achieving the required safe shutdown function are based upon a thermal-hydraulic analysis. The time to complete the operator manual actions for restoration of charging is two hours following a reactor trip. Walk downs demonstrate that these actions can be diagnosed and performed in 50 minutes which includes 5 minutes to re-position each valve.

Therefore, the analysis shows adequate time is available to perform the operator manual actions and demonstrates that the actions are feasible.

Criterion 2: Analysis Showing Adequate Time Available to Ensure Reliability

For feasible actions to be performed reliably, it should be shown that there is adequate time available to account for uncertainties in estimates of the time available and in estimates of how long it takes to diagnose and execute the operator manual actions. Sources of uncertainty that were analyzed are discussed below.

The variations in fire and related plant conditions were analyzed. The fire analysis assumes that all systems and components in the fire area are lost due to fire. The nature of the fire progression and variability in fire detector response time and sensitivities would have insignificant impact on the performance of actions when compared to the relative long period of time available to perform the action (i.e., two hours).

Factors that cannot be recreated in the walk down demonstrations were analyzed. These include problems with equipment such as locked doors, environmental effects that can not be easily simulated in a demonstration, uncertainty in the travel paths required by the safe shutdown operator, and variability in individual operator performance.

The walk through demonstration indicates there is a time margin of 70 minutes to perform the actions. This is adequate time to account for the factors considered.

Therefore, the analysis shows that adequate time is available to ensure that the actions can be performed reliably.

Criterion 3: Environmental Factors

Environmental conditions may affect an individual's mental or physical performance such that they may be degraded. The expected environmental conditions considered both the locations where the operator manual actions are performed and the access route to the area.

The fire zones contained in Fire Area 32 are bounded by heavy concrete walls, ceilings, and floors. Although some zone boundary penetrations are not provided with 3-hour rated seals and HVAC dampers, zone boundaries provide significant obstructions which will limit zone-to-zone fire propagation.

The actions to de-energize and manually open CV-MOV-0112C and de-energize and manually close CV-MOV-0112B are performed in a readily accessible room (e.g., not locked) which can be reached from most plant locations without traversing through Fire Area 32. The location for de-energizing the valve motor-operators is in a non-radiologically controlled area. The location for manually re-positioning the valves is in a radiologically controlled area. However, the area is not contaminated, and hence protective clothing is not required. Sufficient emergency lighting exists at the areas where the actions are performed and along the travel routes to the areas. The noise levels at the areas where the actions are performed should not impede the use of normal communications.

The environmental conditions where the operator manual actions are performed and the access route to the area support the conclusions of the feasibility and reliability analyses. A fire in Fire Area 32 will not impact the manual operations or pathway to the locations of the valves and electrical breakers.

Criterion 4: Equipment Functionality and Accessibility

The equipment necessary to achieve and maintain post-fire hot shutdown is accessible, and not damaged or otherwise adversely affected by the fire and its effects.

The STP fire hazards analysis demonstrates that at least one path of safe shutdown equipment is maintained free from a fire in Fire Area 32 with the exception of cabling to charging pumps suction motor-operated valves. The operator manual actions to de-energize and open CV-MOV-0112C and to de-energize and close CV-MOV-0112B are performed at locations remote from Fire Area 32.

The equipment to perform the actions remains functional and accessible during the fire to support the conclusions of the feasibility and reliability analyses.

Criterion 5: Available Indications

The system or component needs to include diagnostic indications relevant to the desired operator manual actions. These indications include those necessary to detect and diagnose the location of the fire.

Fire Area 32 is served by ionization detection to provide early warning of a fire. The detectors will provide alarms on local fire alarm panels and transmit from the local panels to the fire protection data acquisition system in the main control room.

Once the fire is detected and assessed to jeopardize the capability to support achieving fire safe shutdown, the operator is directed by plant procedure to perform the actions without further diagnosis of plant conditions. The fire safe shutdown analysis demonstrates that sufficient indication is protected from the effects of fire and exists in the control room to verify that the operator manual actions have the expected result. All nuclear instrumentation for reactivity indication and pressurizer level channels A and B for inventory indication remain available.

Diagnostic instrumentation remains available to support the conclusions of the feasibility and reliability analyses.

Criterion 6: Communications

Equipment to support communications among personnel is required to ensure proper performance of operator manual actions. Communications equipment is needed to ensure that any activities requiring coordination are clearly understood and correctly accomplished.

The operator manual actions to de-energize and manually open CV-MOV-0112C and to de-energize and manually close CV-MOV-0112B are sequential actions directed from the control room to the operator at the local station. Communication for performing the operator manual actions is via radios. The radios are routinely carried by plant operators in the performance of their duties. Therefore, any degradation (e.g., weak batteries) would be readily detected during the shift and corrected. Equipment transmission and reception capabilities are adequate and will remain available to facilitate communications between the control room and the locations where the operator manual actions are performed. The operator manual actions are performed in rooms that are not high noise areas and are remote from Fire Area 32.

Communication equipment remains available to support the conclusions of the feasibility and reliability analyses.

Criterion 7: Portable Equipment

The use of portable equipment is not required to perform the operator manual actions or to support the feasibility and reliability analyses.

Criterion 8: Personnel Protection Equipment

Personnel protection equipment, such as protective clothing and self-containing breathing apparatus, is not required to perform the operator manual actions or to gain access to the location where the actions are performed. Therefore, the conclusions of the feasibility and reliability analyses are supported.

Criterion 9: Procedures and Training

Written procedures should cover the operator manual actions that are required to be performed to achieve and maintain hot shutdown. The operator should receive training on these manual actions.

Fires in areas of the plant that do not require alternative shutdown are addressed by procedure. The procedure includes steps for addressing a fire in Fire Area 32. The plant operations staff has been trained on the use of this plant procedure through the licensed operator re-qualification program. The operator manual actions are straightforward. Once the fire condition is diagnosed as jeopardizing safe shutdown capability, the actions are performed in sequence without further diagnosis.

Written procedures and training support the conclusions of the feasibility and reliability analyses.

Criterion 10: Staffing

Adequate numbers of qualified personnel should be on site at all times so that hot shutdown conditions can be achieved and maintained in the event of a fire. Individuals needed to perform the operator manual actions should not have collateral duties, such as fire fighting or control room operation, during the evolution of the fire.

Operations shift staffing is organized to specifically designate the safe shutdown watches. The safe shutdown watches are responsible to execute the safe shutdown fire response procedure steps, including those steps performed outside the control room. The safe shutdown watches are not assigned fire brigade fire fighting responsibilities. The safe shutdown watches remain qualified through the operator re-qualification program.

Plant staffing remains adequate to support the conclusions of the feasibility and reliability analyses.

Criterion 11: Demonstrations

A demonstration with at least one randomly selected but established crew should be performed to provide a degree of overall assurance that the operator manual actions can be performed within the analyzed time available.

The demonstration by a crew member indicates that the operator manual actions to de-energize and manually open CV-MOV-0112C and to de-energize and manually close CV-MOV-0112B can be performed in 50 minutes, providing a margin of 70 minutes before the thermal-hydraulic analysis requires the actions to be performed. This is adequate margin to account for factors that cannot be covered in the demonstration to assure that the actions can be reliably performed.

The STP fire response procedural strategy is constructed such that the procedure steps are performed prior to entering other Emergency Operating Procedures so that operators are not required to handle multiple procedures to achieve safe shutdown conditions in response to a fire. The actions are straightforward enough (e.g., conducive environmental conditions, no special equipment required) so that it is not necessary for all operating crews to demonstrate performance of the action. Training and practice on safe shutdown fire response procedures is done at a frequency consistent with that established in existing training programs on abnormal procedures in compliance with 10 CFR 50.120.

The operator manual actions have been adequately demonstrated that they can be performed within the time required to meet safe shutdown requirements to support the conclusions of the feasibility and reliability analyses.

Conclusion

The operator manual actions ensure that hot shutdown conditions can be achieved and maintained in the event of a fire in lieu of meeting the circuit separation protection criteria of the STP FPP. The operator manual actions to de-energize and manually open CV-MOV-0112C and de-energize and manually close CV-MOV-0112B have been demonstrated that they can be performed within 50 minutes versus a required time of 2 hours. The actions are straightforward and do not create any significant concerns. Analysis of specific criteria discussed above demonstrates that the operator manual actions are feasible and reliable, and will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

4.0 Regulatory Evaluation

4.1 Applicable Regulatory Requirements/Criteria

Section III.G.2 of Appendix R requires that cables whose fire damage could prevent the operation or cause mal-operation of safe shutdown functions be physically protected from fire damage by one of three methods. The use of operator manual actions to mitigate the effects of fire damage to these cables is not listed in the regulation as an acceptable method for satisfying this requirement.

The STPNOC License Condition 2.E specifies, "STPNOC shall implement and maintain in effect all provisions of the approved fire protection program as described in the ... Fire Hazards Analysis Report." The STP Fire Hazards Analysis Report (FHAR) provides an analysis of how the safe shutdown strategy for each fire area meets regulatory requirements.

STP was licensed after January 1, 1979 and is not required to meet Appendix R. The approved STP FPP was reviewed by the NRC and is documented in the STP FHAR.

Regarding the cable and train separation protection requirements of Section III.G.2 of Appendix R, the STP FHAR states:

- (a) Cable and active equipment and associated non-safety circuits of redundant trains are separated by fire barriers having a 3-hour rating where practical.
- (b) Where these 3-hour rated fire barriers have not been provided, STP has provided alternate protection as allowed by Appendix R, Section III.G.2.b or c.
 - (i) Section III.G.2.b allows for separation of redundant trains by a horizontal distance of more than 20 feet with no intervening combustibles or fire hazards. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area.
 - (ii) Section III.G.3 allows for separation of redundant trains by a fire barrier having a 1-hour rating. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area.

Deviations from the requirements described in the FHAR were reviewed by the NRC and are documented in the FHAR. The operator manual actions proposed in this amendment request have not been previously reviewed by the NRC.

Regulatory expectations with Appendix R, Section III.G.2 operator manual actions are provided in NRC Regulatory Issue Summary (RIS) 2006-10 (Reference 6.3) and Enforcement Guidance Memorandum 07-004 (Reference 6.4). The submission of a license amendment is a corrective action option for non-compliances involving operator manual actions.

Draft NUREG-1852 provides the latest published technical guidance to assist in determining that operator manual actions are feasible and can be performed reliably in response to fire.

4.2 Precedent

NRC RIS 2006-10 discusses that operator manual actions in lieu of meeting circuit separation criteria have been previously approved as exemption requests for plants licensed to operate prior to January 1, 1979 (i.e., plants subjected to the requirements of 10 CFR 50, Appendix R). RIS 2006-10 goes on further to state that plants licensed to operate on or after January 1, 1979 (post-

1979 licensees) are not required to meet the requirements of paragraph III.G.2 and use of manual operator actions are approved by a staff decision in an NRC Safety Evaluation Report, either as the result of original licensing or via a license amendment.

4.3 Significant Hazards Consideration

STPNOC has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The design function of structures, systems and component are not impacted by the proposed change. The proposed change involves operator manual actions in response to a fire and will not initiate an event. The proposed actions do not increase the probability of occurrence of a fire or any other accident previously evaluated.

The proposed actions are feasible and reliable and demonstrate that the unit can be safely shutdown in the event of a fire. No significant consequences result from the performance of the proposed actions.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The design function of structures, systems and component are not impacted by the proposed amendment. The proposed change involves operator manual actions in response to a fire. They do not involve new failure mechanisms or malfunctions that can initiate a new accident.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Adequate time is available to perform the proposed operator manual actions to account for uncertainties in estimates of the time available and in estimates of how long it takes to diagnose and execute the actions. The actions are straightforward and do not create any significant concerns. The actions have been verified that they can be performed through demonstration and they are proceduralized. The proposed actions are feasible and reliable and demonstrate that the unit can be safely shutdown in the event of a fire.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, STPNOC concludes that the proposed amendments do not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of “no significant hazards consideration” is justified.

4.4 Conclusion

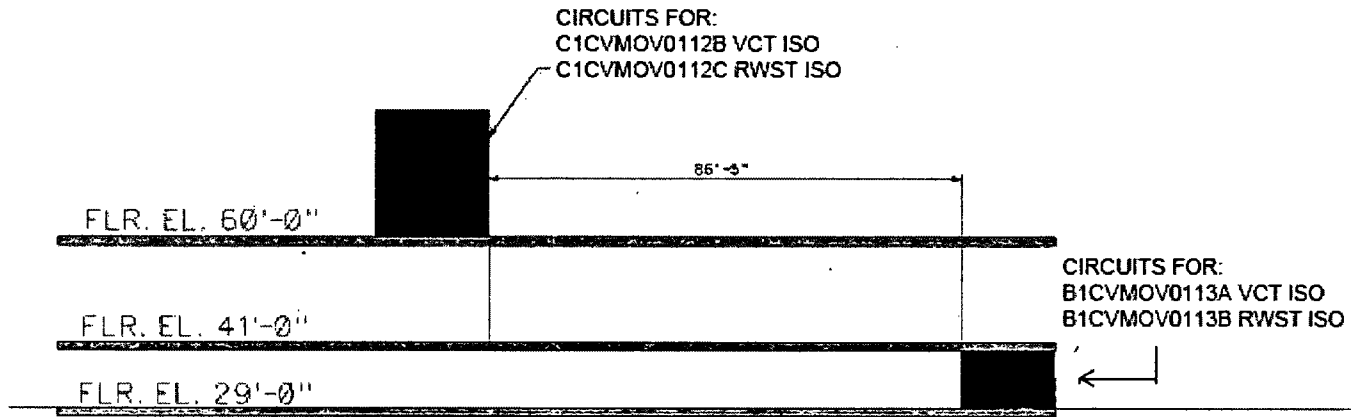
Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission’s regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Consideration

STPNOC has reviewed the proposed amendment and determined that it does not involve (1) a significant hazards consideration, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) a significant increase in the individual or cumulative occupational exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10CFR51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 References

- 6.1 South Texas Project Electric Generating Station – Inspection Report 05000498/2005006 and 05000499/2005006, dated July 14, 2005
- 6.2 Draft Report NUREG-1852, “Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire,” USNRC, September 2006
- 6.3 NRC Regulatory Issue Summary 2006-10: “Regulatory Expectations with Appendix R Paragraph III.G.2 Operator Manual Actions,” dated June 30, 2006
- 6.4 Enforcement Guidance Memorandum 07-004, “Enforcement Discretion for Post-Fire Operator Manual Actions Used as Compensatory Measures for Fire Induced Circuit Failures,” dated June 30, 2007



ELEVATION VIEW

LOOKING SOUTH