

assessment, the Commission concludes that the proposed action would not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed exemption.

For further details with respect to this action, the request for exemption dated January 4, 1995, and other documents are available for public inspection and for copying (for a fee) at the NRC Public Document Room, 2120 L Street, NW, Washington, DC 20555, and at the Local Public Document Room located in the Minneapolis Public Library, 300 Nicollet Mall, Minneapolis, MN 55401.

Dated at Rockville, Maryland, this 6th day of March, 1995.

For the Nuclear Regulatory Commission.

**Donald A. Cool,**

*Director, Division of Industrial and Medical Nuclear Safety, Office of Nuclear Material Safety and Safeguards.*

[FR Doc. 95-6062 Filed 3-10-95; 8:45 am]

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**[Docket 70-364]**

**Babcock and Wilcox Co., Receipt of Petition for Director's Decision Under 10 CFR 2.206**

Notice is hereby given that by Petition dated January 5, 1994, Citizens' Action for a Safe Environment (CASE) and the Kiski Valley Coalition to Save Our Children (The Coalition) (together referred to as Intervenor) filed a joint request for an informal hearing pursuant to 10 C.F.R. Part 2, Subpart L, with regard to Babcock & Wilcox Company's (Licensee) application for renewal of Special Nuclear Materials License SNM-414 issued to the Licensee by the Nuclear Regulatory Commission (Commission) for the Pennsylvania Nuclear Service Operation facility located in Parks Township, Armstrong County, Pennsylvania (Parks Township facility). In its Initial Decision, dated January 3, 1995, authorizing the renewal of the materials license, the Atomic Safety and Licensing Board, consistent with 10 C.F.R. 2.1205(k)(2), referred to the Commission's Executive Director for Operations for consideration as requests for action under 10 CFR 2.206, twelve areas of concern (see Sections B, H, I, M, P, Q, S, T, U, W, X, and Y, Initial Decision at pages 63 to 70) raised in that proceeding by the Intervenor. These concerns were referred to the Director of the Office of Nuclear Material Safety and Safeguards. Each of these concerns has been reviewed with respect to the requirements of 10 CFR 2.206. Sections B, H, I, M, P, S, T, U, W and Y have

failed to satisfy the requirement of Section 2.206 that a request pursuant to section 2.206 must "specify the action requested and set forth the facts that constitute the basis for the request." However, Section B, H, M, P, S, T, U, W, and Y were addressed by the Commission staff in Michael A. Lamastra's affidavit dated September 22, 1994, and Section I was addressed by the Commission staff in Heather M. Astwood's affidavit dated September 22, 1994, filed in the Parks Township proceeding.

Section Q has been interpreted as a request for the Commission to test for radioactive contamination in the general vicinity of Kepple Hill and Riverview in Parks Township. The apparent concern is that this area is downwind of the Apollo facility which the Intervenor assert had been releasing radioactivity at a rate above regulatory limits. The Intervenor rely on letters dated April 20, 1966, and May 26, 1969, concerning the need for experimental data for an air surveillance program at the Apollo plant and authorization by the Commission's predecessor, the Atomic Energy Commission, for the discharge of radioactive materials in concentrations exceeding 10 CFR Part 20 limits.

Section X has been interpreted as a request for the Commission to investigate radiological contamination on the Farmers Delight Dairy Farm (apparently located in Parks Township). The apparent concern is that past operations of the Parks Townships facility caused radioactive contamination of the farm. As basis for this request, Intervenor assert that there is information in a 1966 U.S. Department of Agriculture (USDA) study that indicates that the cattle on the farm were having thyroid problems and that radionuclides were show-up in the cow's milk.

As provided by Section 2.206, appropriate action will be taken on these two requests within a reasonable period of time.

A copy of the Petition and Initial Decision is available for inspection in the Commission's Public Document Room, 2120 L Street, NW, Washington, DC 20555.

Dated at Rockville, Maryland this 3rd day of March 1995.

For the Nuclear Regulatory Commission.

**Robert M. Bernero,**

*Director, Office of Nuclear Material Safety and Safeguards.*

[FR Doc. 95-6065 Filed 3-10-95; 8:45 am]

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**[Docket No. 50-498]**

**Houston Lighting and Power Co., City Public Service Board of San Antonio, Central Power and Light Co., City of Austin, TX; Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for a Hearing**

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-6, issued to Houston Lighting & Power Company, et al., (the licensee) for operation of the South Texas Project (STP), Unit 1, located in Matagorda County, Texas.

The proposed amendment would modify the steam generator tube plugging criteria in Technical Specification 3/4.4.5, Steam Generators, and the allowable leakage for Unit 1 in Technical Specification 3/4.4.6.2, Operational Leakage, and the associated Bases.

Before issuance of the proposed license amendment, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations.

The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that 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; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

**Structural Considerations**

Industry testing of model boiler and operating plant tube specimens for free span tubing at room temperature conditions shows typical burst pressures in excess of 5000 psi for indications of outer diameter stress corrosion cracking with voltage measurements at or below the structural limit of 4.0 volts. One model boiler specimen with a voltage amplitude of 19 volts also exhibited a burst pressure greater than 5000 psi. Burst testing performed on one intersection pulled

from STP Unit 1 with a 0.51 volt indication yielded a measured burst pressure of 8900 psi at room temperature. It is noted that the industry burst pressure tests do not reflect the effects of temperature and material properties in terms of the realized reduction in strength. However, even correcting for the effects of temperature on material properties (which represents about 80% of the strength at room temperature from ASME [American Society of Mechanical Engineers] Code Section III Appendix 1 values) yields effective burst pressures of about 4000 psi which is above the RG [Regulatory Guide] 1.121 limit of 3790 psi (1.43 times the MSLB [main steam line break] pressure differential) at 4.0 volts. The STP Unit 1 data point (0.51 volt) would yield an effective burst pressure of about 7100 psi, which is well above the 95% lower tolerance limit (LTL) prediction per the burst correlation data used.

Additional benefit is realized during normal operation since the proximity of the TSP [tube support plate] will reinforce the tube, further reducing the likelihood of tube burst.

The projected end-of-cycle (EOC) voltage compares favorably with the 4 volt structural limit considering the EPRI [Electric Power Research Institute] voltage growth rate for indications at STP. Using the methodology of the NRC Draft Generic Letter 94-XX, the structural limit is reduced by allowances for uncertainty and growth to develop a beginning-of-cycle (BOC) repair limit which should preclude EOC indications from growing in excess of the structural limit. The non-destructive examination (NDE) uncertainty to be applied per EPRI is approximately 21 percent. The EPRI recommended growth allowance of 35 percent/EPFY [effective full power years] is also applied. This growth value is conservative for STP Unit 1 based on previous inspection history. By adding NDE uncertainty allowances and a crack growth allowance to the repair limit, the structural limit can be validated. Therefore, the maximum allowable BOC repair limit (RL) based on the structural limit of 4 volts can be represented as:

$$RL + (0.20 \times RL) + (0.53 \times RL) = 4 \text{ volts,} \\ \text{which yields RL of 2.3 volts.}$$

\*The 35% growth rate for 1 EPFY was scaled up to the cycle length used at South Texas.

This repair limit (2.3 volts) reasonably could be applied for APC [alternate plugging criteria] implementation to repair bobbin indications greater than the 1.0 volt criterion specified by NRC Generic Letter 94-XX and is independent of RPC [rotating pancake coil] confirmation of the indications. Houston Lighting & Power has chosen to use a steam generator tube upper repair limit of 2.3 volts to assess tube integrity for those bobbin indications which are above 1.0 volt but do not have confirming RPC calls. This 2.3 volt upper limit for non-confirmed RPC calls is consistent with the NRC Generic Letter 94-XX which establishes 2.7 volts as the upper limit for 3/4 tubing. Since the upper bound for repair of non-confirmed RPC is limited to a value far less than the structural limit associated with full alternate criteria, the establishment of the repair limits are determined to be reasonable and conservative

with respect to the industry pulled tube data base used.

#### Leakage Considerations

As part of the implementation of APC, the distribution of EOC cracking indications at the TSP intersections has been used to calculate the primary to secondary leakage which is bounded by the maximum leakage required to remain within applicable dose limits (10 CFR 100, NUREG-0800 and GDC [General Design Criterion] 19). This limit was calculated using the Technical Specification RCS [reactor coolant system] Iodine-131 transient spiking values consistent with NUREG-0800. Applications of the APC criteria requires the projection of postulated MSLB leakage based on the projected EOC voltage distribution for the beginning of the cycle. Projected EOC voltage distribution is developed using the most recent EOC eddy current results and a voltage measurement uncertainty. Draft NUREG-1477 requires that all indications to which APC is applied must be included in the leakage projection.

The projected MSLB leakage rate calculation methodology prescribed in EPRI TR-100407 will be used to calculate the EOC leakage. A Monte Carlo approach will be used to determine the EOC leakage, accounting for all of the ECT [eddy current testing] uncertainties, voltage growth, and an assumed probability of detection (POD) of 0.6 for a 1.0 volt repair limit. The fitted logarithmic function probability of leakage correlation will be used to establish the STP MSLB leak rate used for comparison with a bounding allowable leak rate in the faulted loop which would result in radiological consequences which are within applicable dose limits. Due to the relatively low voltage levels of indications at STP and low voltage growth rates, it is expected that the actual calculated leakage values will be far less than this limit. Currently, the leakage projected for EOC-05 at STP Unit 1 is 0.02 gpm [gallons per minute] (<21 gpd [gallons per day]) which is negligible in comparison to the allowable limit.

Therefore, implementation of APC does not adversely affect steam generator tube integrity and implementation will be shown to result in acceptable consequences. The proposed amendment does not result in any increase in the probability of consequences of an accident previously evaluated.

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

Implementation of the proposed steam generator tube alternate plugging criteria for ODSCC [outer diameter stress corrosion cracking] at the TSP intersections does not introduce any significant changes to the plant design basis. Use of the criteria does not provide a mechanism which could result in an accident outside of the region of the TSP elevations since no ODSCC has been identified outside the thickness of the TSPs. It is therefore expected that for all plant conditions, neither a single nor multiple tube rupture event would occur in a steam generator where APC has been applied.

Specifically, Houston Lighting & Power will implement, for Unit 1, a maximum

leakage rate of 150 gpd per steam generator (SG) to help preclude the potential for excessive leakage during all plant conditions. The current technical specification limits on primary-to-secondary leakage at operating conditions are 1 gpm for all steam generators or 500 gpd for any one SG. The RG 1.121 criterion for establishing operational leakage rate limits governing plant shutdown be based [sic] upon leak-before-break (LBB) considerations to detect a free span crack before potential tube rupture as a result of faulted plant conditions. The 150 gpd limit is intended to provide for leakage detection and plant shutdown in the event of an unexpected crack propagation resulting in excessive leakage. RG 1.121 acceptance criteria for establishing operating leakage limits are based on LBB considerations such that plant shutdown is initiated if the permissible crack is exceeded.

The predicted EOC leakage for STP is based on a 35% growth rate and does not take credit for the TSP proximity during normal operation. The total current projected leakage for EOC 05 is 20.5 gpd for the limiting SG (C) at STP Unit 1 which is considerably less than the 150 gpd limit. Thus, the 150 gpd limit provides for plant shutdown prior to reaching critical crack lengths. Additionally, this leak-before-break evaluation assumes that the entire crevice area is uncovered during the secondary side blowdown of a MSLB. Typically, it is expected for the vast majority of intersections that only partial uncover will occur. Thus, the proximity of the TSP will enhance the burst capacity of the tube.

Steam generator tube integrity is continually maintained through inservice inspection and primary-to-secondary leakage monitoring. Any tubes falling outside the APC repair limits are removed from service. Therefore, the possibility of a new or different kind of accident from any accident previously developed is not created.

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

The use of the voltage based bobbin probe for dispositioning ODSCC degraded tubes within TSP intersections by APC is demonstrated to maintain steam generator tube integrity in accordance with the requirements of RG 1.121. RG 1.121 describes a method acceptable to the NRC staff for meeting GDCs 14, 15, 31, and 32 by reducing the probability or the consequences of steam generator tube rupture. This is accomplished by determining the limiting conditions of degradation of steam generator tubing, as established by inservice inspection, for which tubes with unacceptable cracking are removed from service. Upon implementation of the criteria, even under the worst case conditions, the occurrence of ODSCC at the TSP elevation is not expected to lead to a steam generator tube rupture event during normal or faulted plant conditions. The EOC distribution of crack indications at the TSP elevations will be confirmed to result in acceptable primary-to-secondary leakage during all plant conditions and that radiological consequences are not adversely impacted.

In addressing the combined effects of loss of coolant accident (LOCA) and safe

shutdown earthquake (SSE) on the steam generator component (as required by GDC 2), it has been determined that tube collapse may occur in the steam generators at some plants. This is the case at STP as the TSP may become deformed as a result of lateral loads at the wedge supports at the periphery of the plate due to the combined effects of the LOCA [loss of coolant accident] rarefaction wave and SSE loadings. The resulting secondary-to-primary pressure differential on the deformed tubes may cause some of the tube to collapse.

There are two concerns associated with steam generator tube collapse. First, the collapse of steam generator tubing reduces the RCS flow area through the tubes. The reduction on flow area increases the resistance to flow of steam from the core during a LOCA which, in turn, may potentially increase peak clad temperature (PCT). Second, there is a potential that through wall cracks in tubes could sufficiently enlarge during tube deformation or collapse, causing sufficient in-leakage of secondary water back to the core which dilutes the poisoning effect of boron injection from the emergency cooling system. Again, an increase in core PCT may result.

Consequently, since the LBB methodology is applicable to the STP reactor coolant loop piping, the probability of breaks in the primary loop piping is sufficiently low that they need not be considered in the structural design of the plant. The limiting LOCA event becomes either the accumulator, RHR [residual heat removal], or the pressurizer surge line break. The analysis identifies tube located adjacent to wedge regions that are subject to potential collapse during combined LOCA and SSE. These tubes will be excluded from application of APC. Thus, existing tube integrity requirements apply to these tubes and the margin of safety is not reduced.

Implementation practices using the bobbin probe voltage based tube plugging criteria bounds RG 1.83 considerations by:

(1) Using enhanced eddy current inspection guidelines consistent with those used by EPRI in developing the correlations. This provides consistency in voltage normalization,

(2) Performing a 100 percent bobbin coil inspection for all hot leg tube support plate intersections and all cold leg intersections down to the lowest cold leg tube support plate with outer diameter stress corrosion cracking (ODSCC) indications. The determination of the tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20% random sampling of tubes inspected over their full length, and

(3) Incorporating RPC inspection for all tubes with larger indications left inservice. This further establishes the principal degradation morphology as ODSCC.

Implementation of APC at TSP intersections will decrease the number of tubes which must be repaired. Since the installation of tube plugs (to remove ODSCC degraded tubes from service) reduces the RCS flow margin, APC implementation will help preserve the margin of flow that would otherwise be reduced.

The projected EOC primary-to-secondary leakage rate allowed is bounded by a leak

rate which limits the radiological consequences of a EOC MSLB to within applicable dose limits. Therefore, this change does not involve a significant reduction in the margin to safety.

It is therefore concluded that the proposed license amendment request does not result in a significant reduction in the margin of safety as defined in the plant Final Safety Analysis Report or Technical Specifications.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination.

Normally, the Commission will not issue the amendment until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendment before the expiration of the 30-day notice period, provided that its final determination is that the amendment involves no significant hazards consideration. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish in the **Federal Register** a notice of issuance and provide for opportunity for a hearing after issuance. The Commission expects that the need to take this action will occur very infrequently.

Written comments may be submitted by mail to the Rules Review and Directives Branch, Division of Freedom of Information and Publications Services, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should cite the publication date and page number of this **Federal Register** notice. Written comments may also be delivered to Room 6D22, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland, from 7:30 a.m. to 4:15 p.m. Federal workdays. Copies of written comments received may be examined at the NRC Public Document Room, the Gelman Building, 2120 L Street, Washington, DC.

The filing of requests for hearing for petitions for leave to intervene is discussed below.

By April 12, 1995, the licensee may file a request for a hearing with respect to issuance of the amendment to the subject facility operating license and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for a hearing and a petition for leave to intervene. Requests for a hearing and a petition for leave to intervene shall be filed in accordance with the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. Interested persons should consult a current copy of 10 CFR 2.714 which is available at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the Wharton County Junior College, J.M. Hodges Learning Center, 911 Boling Highway, Wharton, Texas 77488. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition; and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene shall be set forth with particularly the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to 15 days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than 15 days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene

which must include a list of the contentions which are sought to be litigated in the matter. Each contention must consist of a specific statement of the issue of law or fact to be raised or controverted. In addition, the petitioner shall provide a brief explanation of the bases of the contention and a concise statement of the alleged facts or expert opinion which support the contention and on which the petitioner intends to rely in proving the contention at the hearing. The petitioner must also provide references to those specific sources and documents of which the petitioner is aware and on which the petitioner intends to rely to establish those facts or expert opinion. Petitioner must provide sufficient information to show that a genuine dispute exists with the applicant on a material issue of law or fact. Contentions shall be limited to matters within the scope of the amendment under consideration. The contention must be one which, if proven, would entitle the petitioner to relief. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If a hearing is requested, the Commission will make a final determination on the issue of no significant hazards consideration. The final determination will serve to decide when the hearing is held.

If the final determination is that the amendment request involves no significant hazards consideration, the Commission may issue the amendment and make it immediately effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendment.

If the final determination is that the amendment request involves a significant hazards consideration, any hearing held would take place before the issuance of any amendment.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Docketing and Services Branch, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, by the above date. Where petitions are filed during the last 10 days of the notice

period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at 1-(800) 248-5100 (in Missouri 1-(800) 342-6700). The Western Union operator should be given Datagram identification Number N1023 and the following message addressed to William D. Beckner, Director, Project Directorate IV-1: petitioner's name and telephone number, date petition was mailed, plant name, and publication date and page number of this **Federal Register** notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to Jack R. Newman, Esq., Newman & Holtzinger, P.C., 1615 L Street, NW., Washington, DC 20036, attorney for the licensee.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

For further details with respect to this action, see the application for amendment dated March 1, 1995, which is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the Wharton County Junior College, J.M. Hodges Learning Center, 911 Boling Highway, Wharton, Texas 77488.

Dated at Rockville, Maryland, this 7th day of March 1995.

For the Nuclear Regulatory Commission.

**Thomas W. Alexion,**

*Project Manager, Project Directorate IV-1, Division of Reactor Projects III/IV, Office of Nuclear Reactor Regulation.*

[FR Doc. 95-6067 Filed 3-10-95; 8:45 am]

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[Docket No. 50-498]

**Houston Lighting and Power Co., City Public Service Board of San Antonio, Central Power and Light Co., City of Austin, TX; Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for a Hearing**

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment

to Facility Operating License No. NPF-6, issued to Houston Lighting & Power Company, et al., (the licensee) for operation of the South Texas Project (STP), Unit 1, located in Matagorda County, Texas.

The proposed amendment would change Technical Specification 3/4.4.5, Steam Generators, and the associated Bases to allow the use of an alternate plugging criteria (known in the industry as F\*) on steam generator tubes that are defective or degraded within certain areas within the tubesheet.

Before issuance of the proposed license amendment, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that 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; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

The proposed changes to the Steam Generator section of Technical Specifications do not affect any accident initiators or precursors and do not alter the design assumptions for the systems or components used to mitigate the consequences of an accident. The requirements approved by the NRC will not be reduced by this request. Since F\* utilizes the "as rolled" tube configuration that exists as part of the original steam generator design, all of the design and operating characteristics of the steam generator and connected systems are preserved. The F\* joint has been analyzed and tested for design, operating and faulted condition loadings in accordance with Regulatory Guide 1.121 safety factors. At worst case, a tube leak would occur with the result being a primary to secondary leak.

Should a tube leak occur, the impact is bounded by the ruptured tube evaluation submitted by HL&P [Houston Lighting & Power] for the STP Unit 1 operating license. No new or unreviewed accident conditions are created by the use of F\* criteria. The potential for a tube rupture is not increased from the original submittal, thus there is no impact on accidents evaluated as the design