

February 29, 2000

Template = NRR-106

MEMORANDUM TO: Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: John A. Nakoski, Senior Project Manager, Section 1 /RA/
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - RESOLUTION OF THE
REQUEST FOR ADDITIONAL INFORMATION FOR THE MULTIPART
EXEMPTION REQUEST (TAC NOS. MA6057 AND MA6058)

The U.S. Nuclear Regulatory Commission (NRC) staff is in the process of reviewing the risk-informed exemption requests that the STP Nuclear Operating Company (STPNOC) submitted on July 13, 1999. As part of that process, the NRC staff issued a request for additional information (RAI) on January 18, 2000. Currently, the staff is working with STPNOC to ensure that STPNOC clearly understands the extent of the questions raised and for the NRC staff to gain a better understanding of the scope of the expected response by STPNOC. The NRC staff has agreed to participate in periodic teleconferences to discuss specific questions raised in the RAI. In preparation for these teleconferences, the licensee will frequently provide the NRC staff with information either using email or by fax. Likewise, the NRC staff will frequently provide information to the licensee using similar methods. All of the information exchanged by email or fax between the licensee and the NRC during this process will be made available to the public.

The attachments to this memorandum provide (1) a proposed draft timeline from the licensee on its projected schedule to complete the activities associated with the multipart risk-informed exemption request, (2) an email received from the licensee on February 15, 2000, providing its comments on RAI question number 46, and (3) an email sent to the licensee on February 17, 2000, providing the NRC staff's response to its February 15, 2000, email. Attachment 1 was used during a February 9, 2000, teleconference with the licensee during which discussions were held on the NRC staff's goals for completing its reviews of the subject exemptions. Attachments 2 and 3 will be used to facilitate a discussion on a future teleconference to be scheduled.

- Attachments: 1. February 9, 2000, proposed draft timeline
2. February 15, 2000, email - STPNOC comments on RAI question no. 46
3. February 17, 2000, email - NRC response to comments on RAI question no. 46

Docket Nos. 50-498 and 50-499

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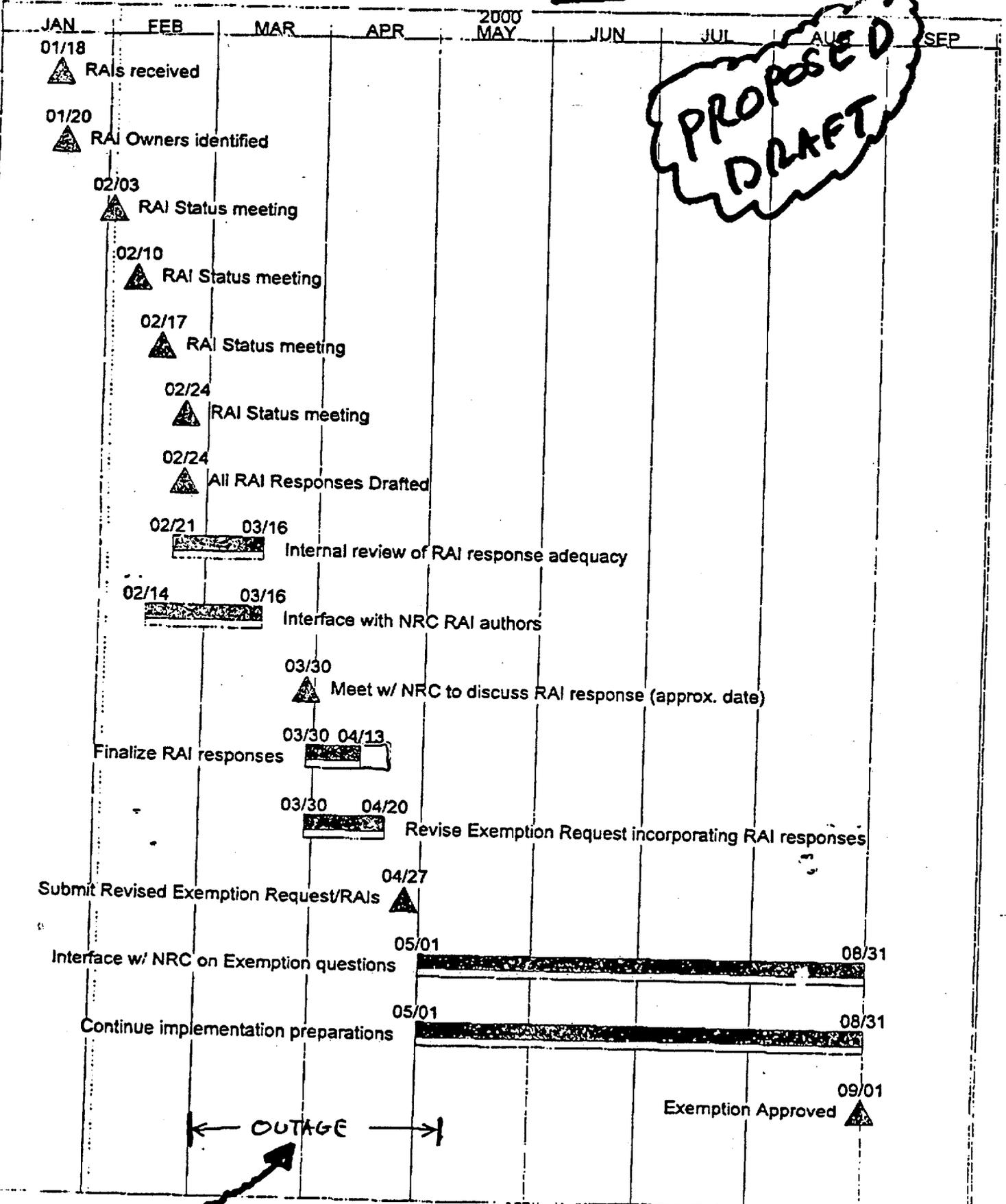
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GQA EXEMPTION/RAI TIMELINE

1

PROPOSED DRAFT



← OUTAGE →



From: "Kathleen Work" <kawork@stpegs.com>
To: OWFN_DO.owf4_po(JAN1)
Date: Tue, Feb 15, 2000 3:03 PM
Subject: Clarification Needed for RAI # 46

John, here is the RAI #46 and our comments. I will let you know about setting up a phone call for next week sometime. Kathy

RAI #46-

(a) Clarify how systems that are comprised entirely of safety-related LSS and NRS components or systems that are comprised of a mixture of safety-related LSS and NRS and nonsafety-related LSS and NRS components will be treated under the maintenance rule.

(b) Provide examples of systems where this situation occurs (i.e. radiation monitoring system, emergency lighting system, plant communication system).

(c) How will performance monitoring at the plant/system/train function level against established criteria continue for these systems as stated in the exemption request?

RESPONSE:

(a) There are no systems that are comprised entirely of safety-related components. If an SSC is LSS or NRS, it will be removed from the scope of the Maintenance Rule (whether it is safety related or non-safety-related).

(b) and (c) [It isn't clear what is meant by "this situation" in part 'b' of the question nor what is meant by "these systems" in part 'c' of the question.]

From: John Nakoski
To: "kawork@stpegs.com"@GATED.nrcsmtp
Date: Thu, Feb 17, 2000 2:32 PM
Subject: Re: Clarification Needed for RAI # 46

Kathy,

Here is the a brief discussion of our thoughts on your questions to RAI #46. I think it is clear that this is a good one to discuss on a teleconference to clarify our expectations and firm up your response.

John Nakoski

Response to STP's 2/15/2000 RAI#46 initial response.

RAI # 46 is intended to obtain clarifying information for STP's proposed maintenance rule treatment of systems that are composed entirely of LSS or NRS components. The terms "this situation" and "these systems" in parts b and c of the original question refer to any systems that are entirely composed of LSS and NRS components.

Question A can be restated as:

Clarify how systems comprised entirely of LSS and NRS components will be treated under the maintenance rule.

Question B can be restated as:

Provide examples of systems that are entirely composed of LSS and NRS components.

Question C is intended to clarify what type of monitoring the licensee intends to perform for LSS and NRS systems since the original exemption had some inconsistencies relative to how this monitoring would be performed (see additional background below).

Additional Background for RAI #46.

The licensee states in 4 places in their exemption request that the intended change in maintenance rule monitoring will consist of the use of system/train or plant/system/train level monitoring rather than component level monitoring. (Refer to STP exemption request - attachment 1, pp 19,25,27 and attachment 2, p 2)

CC: Gramm, Robert