

July 21, 2000

Mr. William T. Cottle
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL
INFORMATION RE: LICENSE AMENDMENT REQUESTS ASSOCIATED WITH
CONTROL ROOM AND FUEL HANDLING BUILDING VENTILATION SYSTEMS
(TAC NOS. MA3849 AND MA3850)

Dear Mr. Cottle:

In your letter dated April 28, 1998, revised by letters dated April 22, 1999, and April 27, 2000, STP Nuclear Operating Company (STPNOC) proposed to change the Technical Specifications to modify requirements associated with the control room and fuel handling building HVAC [heating, ventilation, and air conditioning] systems. The amendments proposed an allowed outage time of 12 hours for a condition where multiple trains of control room or fuel handling building HVAC systems are inoperable.

Based on our review of the April 27, 2000, submittal, we have determined that additional information is required in order for us to complete our review of your request. The enclosed questions were discussed with your staff during a teleconference held on July 20, 2000, to ensure clarity of the questions. Although no firm date for the response was agreed to during the teleconference, your staff has indicated that mid-August would be a target date.

Please let me know if you have any questions regarding the enclosed request for additional information or if you foresee any delay in preparing your response.

Sincerely,

/RA/

Tae Kim, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

cc: See next page

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February 2000

REQUEST FOR ADDITIONAL INFORMATION (RAI)

SOUTH TEXAS PROJECT- UNITS 1 AND 2

In order to demonstrate continued compliance with GDC [General Design Criteria] 19 and 10 CFR Part 100, the licensee is requested to address the effect the 12-hour AOT [allowed outage time] would have on the assumptions in the DBA [design-basis accident] analysis. The discussion should include the frequency of the AOT, the effect on the ESF [engineered safety feature] systems, the control room and control room envelope, and fuel handling building HVAC [heating, ventilation, and air conditioning] systems. Please respond to the following questions:

1. Although this 12-hour AOT may not increase the probability of an accident, it will likely have a negative effect on mitigation. To demonstrate continued compliance with GDC 19 and 10 CFR Part 100, what compensatory measures are being taken to ensure the ability to mitigate the consequences of an accident should one occur during an AOT?
2. What is the increase in unfiltered in-leakage in the control room envelope and what is the basis for that determination? If there is an increase in unfiltered in-leakage, has it been factored into a revised dose analysis? Using the current licensing-basis assumptions, what increase in dose to the operator would result from the increase in unfiltered in-leakage? (i.e., will the dose limits continue to be met?)
3. With an inoperable fuel building ventilation system, what is the increase in the potential offsite doses? Will 10 CFR Part 100 continue to be met? Will GDC 19 continue to be met? Does the DBA calculations reflect this change in your assumptions?
4. Discuss the effects the AOT will have on required control room alarms, controls, and displays.
5. Describe changes that the AOT will have on operator training as required by 10 CFR 55.59.
6. With respect to proposed Action 27, it is stated that Action 27 is modified to declare the ventilation train associated with the inoperable channel inoperable and requires the action for an inoperable ventilation train be carried out per Specification 3.7.7.... However, we found that there is no clear definition of a system or a train when used in the context of this request. For example, Action 27 refers to a ventilation train being inoperable and carrying out the actions of Specification 3.7.7. Whereas Specification 3.7.7 refers to action to be taken when systems are inoperable. For the control room makeup and cleanup filtration system, neither the TS nor the associated Bases defines a system or a train.
7. How does STP account for the proposed increase in unavailability of the control room HVAC in its initiating event frequency modeled in the PRA [probabilistic risk assessment]?

8. STP also stated "Control Room...HVAC...are not designed to mitigate core damage..." (page 9 of 4/27/2000 submittal). Although CR HVAC may not be explicitly modeled in the PRA for an accident mitigation effort, it is implicitly assumed that CR HVAC would be available and thus allow the control room operators to participate in the mitigation effort.

Please assess operator response actions modeled in the PRA and provide justification that the human reliability assumed in the PRA would not be degraded by radiological environment if an accident were to occur when the HVAC was unavailable.

9. STP's current "risk" analysis stops at declaring that the annual probability of a design-basis accident is low and concludes that there is no increase in CDF [core damage frequency] or LERF [large early release frequency] as a result of the proposed change. If human reliability (discussed in #2) is expected to be degraded, provide an assessment of the impact of HVAC unavailability on human reliability and show that the risk impact meets the guideline of Regulatory Guides 1.174 and 1.177.
10. STP stated that the most significant difference between the STP application and TSTF [Technical Specifications Task Force]-287 is that the TSTF is limited to system inoperability caused by an inoperable boundary whereas STP does not believe the cause of the inoperable condition is relevant. What other causes does STP envision and what impact would they have on "closing the opening promptly"? Consequently, what impact would that have on the operators' ability to mitigate an accident and how would that impact the results of the type of risk analysis addressed in Question #8?