UNITED STATES
**NUCLEAR REGULATORY COMMISSION**
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MEMORANDUM TO: Robert A. Gramm, Chief, Section 1
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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - DRAFT INFORMATION PROVIDED BY LICENSEE ON FEBRUARY 28, 2001, FOR RESOLUTION OF OPEN ITEMS FROM DRAFT SAFETY EVALUATION (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. As part of that process, the NRC staff issued a draft safety evaluation on November 15, 2000. Currently, the staff is working with STPNOC to resolve the open and confirmatory items from the draft safety evaluation. The NRC staff is participating in periodic teleconferences to discuss the resolution of the open and confirmatory items. 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 provide the draft information provided by the licensee to facilitate discussions on the resolution of several open items based on comments made by the staff during a February 15 - 16, 2001, meeting with the licensee. Attachment 1 provides a draft revised response to open item 3.6. Attachment 2 provides a draft revision to the proposed Final Safety Analysis Report section documenting the categorization, treatment, and evaluation and assessment processes that will be used as the basis for any exemptions granted.

Attachments: As stated

Docket Nos. 50-498 and 50-499

ATTACHMENT 1

REVISED DRAFT RESPONSE TO OPEN ITEM 3.6

# DRAFT

**Open Item 3.6:** STPNOC needs to finalize its process for the development and implementation of general notes in the categorization of SSCs and provide it to the NRC for review. Further issues may be developed related to this area after receipt of the finalized process.

**Revised Response:**

As stated in UFSAR Section 13.7.2.4, Ggeneral notes are used to providedocument component risk justification, where needed, for similar component types that are treated the same from system to system. Examples include handswitches, indication-only instrumentation, and vent/drain valves. Due to the large number of such components and the similarity of the justification from component to component and from system to system, reference to a general note provides an efficient and consistent method to document the appropriate justification. Components covered by a general note are not excluded from review by the GQA Working Group. These components are evaluated along with other components to ensure proper applicability of the note and appropriateness of the risk categorization. The use of general notes is simply an administrative tool that allows for increased efficiency in the documentation of justifications of large numbers of similar components. In other words, rather than repeating the same justification over and over again for similar components, reference to a general note provides a consistent and efficient method for documenting the justification. General notes are not used for system functions.

STPNOC has enhanced its process for the development and implementation of general notes used in the categorization of SSCs. Specifically, STPNOC has performed the following:

1. Enhancement of General Notes – As shown by the attached, the justifications provided to support the risk categorizations have been revised to provide a more comprehensive and technically defensible basis. In addition, the scope of the notes has been clarified in some instances. ~~In addition, the scope of the notes has been clarified in some instances. STPNOC points out that the scope of the note on 'pressure boundary' has been clarified. It was never the intent of this note to be applied to "low pressure or high volume" and the note was not applied in this manner. Rather, the use of the note was limited to "low pressure and high volume". The justification originally provided for this note attests to this approach. Thus, the note would never be applied to the Reactor Coolant System, as an example. Finally, the notes on relief valves and pressure boundary were~~as ~~eliminated~~. In cases where a general note was eliminated (i.e., relief valves and pressure boundary), the documented risk basis for each affected SSC was enhanced with clarifying detail.
2. The methodology for use of the general notes has been incorporated into a draft revision to the Graded QA Working Group procedure. The attached excerpt provides additional details.
3. The control of general notes, including development, approval, and change control, has also been included in the above procedure revision.

4. The GQA Working Group has completed a comprehensive effort to review the previous component categorizations that involved the use of general notes and to compare the categorizations to the revised notes. The purpose of the review was to ensure that, based on the revised notes, the component was within the scope of the note and that its risk categorization was consistent with that called out by the note. The risk categorization of some components was changed as a result of this review. The review process and the risk changes were presented to and approved by the Expert Panel.
5. As part of the above review and consistent with improvements in the risk significance basis document (RSBD) for risk categorizations, any component that utilizes a general note as a basis will now have that general note number referenced in the RSBD documented bases for risk categorizations.

## GENERAL NOTES FOR GQA REVIEW

| # | SUBJECT | SCOPE | RISK (see remarks) | BASIS |
|---|---|---|---|---|
| 1 | Vent , drain, test valves | 1 inch or less in size | NRS | Normally closed and capped. Gross leakage not credible. Good reliability based on STP and industry experience. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position and ensures that the valve is capped. |
| 2 | Normally open manual valves in main flow path | Does not include throttle valves | Same as pressure boundary risk | An open valve is essentially a piece of pipe. Valve disk failure in a manner which would impede flow is not considered a credible event. These valves are locked open or locked-in-place, where additional assurance is required. Gross leakage not credible. Good reliability based on STP and industry experience. Operation of the system and the monitoring of system parameters are other indicators of proper valve status. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position and ensures that the valve is locked, if applicable. |
| 3 | Other valves not included in Notes 1 and 2 above, including instrument root valves and branch line valves | a. 1 inch or less in size<br>b. Size of valve relative to main process piping is small | NRS for pressure boundary purposes only | Gross leakage not credible. Good reliability based on STP and industry experience. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position. |
| 4 | Snubbers | | Same as pressure boundary risk | Even though the snubber is designed to protect the system during a seismic event, the more credible failure mode would be failure of a snubber to allow for thermal movement during normal operations (fail rigid). If such a failure were severe enough to cause overstressing, it would exhibit itself first through deformation of the snubber itself or to its supports. It is highly unlikely that the piping would be damaged (EPRI report TR-110381) and even if it were, it would be through plastic deformation and/or through a leak-before-break scenario. Piping leaks would become quickly evident during routine operator rounds, system engineer walkdowns, or other visual or system performance indication. The probability of such an unlikely event occurring at the same time as a safety system being demanded to support accident or transient mitigation is even more remote. Piping failure during a seismic event from a "fail free" snubber is also very unlikely due to the robustness of the ASME-designed systems (EPRI report TR-110381). Snubber is conservatively assigned the same risk as the pressure boundary risk for the portion of piping that the snubber is located on. |

Remarks: 1. Unless ranked higher by the PRA.

2. When a critical attribute is provided for a component, it is understood that the critical attribute must function sufficiently enough to meet the design functional requirements associated with that attribute. For example, the attribute "Permit Flow in normal direction", as given to a check valve is understood to mean that the check valve must not only open in the normal direction of flow, but must open sufficiently enough to meet design flow requirements.
3. For a valve, the critical attribute of "pressure boundary" means ability to contain the fluid if the valve is normally open and ability to contain the fluid and isolate the line if the valve is normally closed.
4. Closed and capped 1 inch or less test valves that are part of the containment isolation boundary fall under the scope of Note 1 and are NRS.

## GENERAL NOTES FOR GQA REVIEW

| # | SUBJECT | SCOPE | RISK (see remarks) | BASIS |
|---|---|---|---|---|
| 5 | Instrument Indication and recorders, including supporting devices such as transmitters, etc. | a. Visual indication only. Not involved in the generation of alarms or actuation signals<br>b. Not identified by Operations as being critical | NRS | Failure would not affect risk significant system functions. The majority of these are local indicators. Diverse indication is typically available. |
| 6 | Handswitches, Control Room | If controlled component has some risk significance, risk of switch cannot be NRS | 1 Level lower than controlled component | Reliability of handswitches has been very good. Local/ASP redundant switch available. Most time sensitive operations are automatic, do not require switch manipulation, and rely only on handswitch circuit continuity for success. The probability of a circuit continuity failure in a static role is very low and is clearly less than the probability of failure for the controlled component, which must change state. Automatic safety systems are periodically tested and these tests include the automatic initiation circuitry. In addition, handswitches are manipulated on a regular basis as part of routine operations. Any failure in the handswitch or its associated electrical circuitry would manifest itself during these operations. |
| 7 | Handswitches, Transfer (between control room and local/ASP) | If controlled component has some risk significance, risk of switch cannot be NRS | 2 Levels lower than controlled component | Reliability of handswitches has been very good. Preferred method is to use control room switch. Transfer switch is normally positioned for control room operations. Thus, transfer switch would not normally have to be manipulated. Only function is circuit continuity. The probability of a circuit continuity failure in a static role is very low and is clearly less than the probability of failure for the controlled component, which must change state. Automatic safety systems are periodically tested and these tests include the automatic initiation circuitry. |
| 8 | Handswitches. Local or on Aux Shutdown Panel | If controlled component has some risk significance, risk of switch cannot be NRS | 2 levels lower than controlled component | Reliability of handswitches has been very good. The need to use this switch would mean failure of the automatic initiation, if applicable, and either a malfunction in the control room switch or a need to evacuate the control room, both highly unlikely events. |
| ~~9~~ | ~~Pressure boundary~~ | ~~Low pressure and high volume system~~ | ~~LOW~~ | ~~Low pressure high volume characteristics of system mean that credible leakage would not have a significant impact on system operation. Typically, there are means for make-up to the system. Reliability in this area has been good~~ |

Remarks: 1. Unless ranked higher by the PRA.

2. When a critical attribute is provided for a component, it is understood that the critical attribute must function sufficiently enough to meet the design functional requirements associated with that attribute. For example, the attribute "Permit Flow in normal direction", as given to a check valve is understood to mean that the check valve must not only open in the normal direction of flow, but must open sufficiently enough to meet design flow requirements.

3. For a valve, the critical attribute of "pressure boundary" means ability to contain the fluid if the valve is normally open and ability to contain the fluid and isolate the line if the valve is normally closed.

4. Closed and capped 1 inch or less test valves that are part of the containment isolation boundary fall under the scope of Note 1 and are NRS.

## GENERAL NOTES FOR GQA REVIEW

| # | SUBJECT | SCOPE | RISK (see remarks) | BASIS |
|---|---|---|---|---|
| ~~10~~ 9 | Containment Isolation | Line penetrating containment is part of a water system | LOW | Leakage paths that would threaten public health and safety are not credible. Failure of a containment isolation valve that is normally closed or that closes upon receipt of a containment isolation signal would not lead to a radiation release to the outside environment unless multiple failures of equipment occur at nearly the same time. A loss of coolant accident must occur along with a piping break and failure of the redundant containment isolation valve to close. Containment isolation valves that are required to be open during accident conditions are in a closed water system which is under duty during accident conditions and, therefore, represent pathways for mass and inventory to enter containment and, if exiting containment, represent mass and inventory which is contained in a closed system. In addition, the piping systems have a much higher pressure rating than the containment building. |
| ~~11~~ 10 | Alarm Instrumentation | | No higher than LOW | Provides useful information to operator, but failure would not, in and of itself, fail a risk significant system function. Diversity of alarm indication and system parameter indication are typically available. |
| 11 ~~2~~ | Panels, Enclosures, and Terminal boards | | No higher than LOW | Ranked LOW if they contain risk significant components; otherwise ranked NRS. Passive and inherently reliable device, based on STP and industry experience. |
| 12 ~~3~~ | Limit Switches | a. Indication only, i.e., does not provide actuation signal<br>b. Not identified by Ops as being critical | NRS | Indication only. Failure would not, in and of itself, fail a risk significant system function. Diversity is available through other means, such as indication of flow, pressure, etc. In addition, valves and HVAC dampers are manipulated on a regular basis as part of routine operations. Any failure in the associated position limit switches or in the associated electrical circuitry would manifest itself during these operations. |

Remarks: 1. Unless ranked higher by the PRA.

2. When a critical attribute is provided for a component, it is understood that the critical attribute must function sufficiently enough to meet the design functional requirements associated with that attribute. For example, the attribute "Permit Flow in normal direction", as given to a check valve is understood to mean that the check valve must not only open in the normal direction of flow, but must open sufficiently enough to meet design flow requirements.

3. For a valve, the critical attribute of "pressure boundary" means ability to contain the fluid if the valve is normally open and ability to contain the fluid and isolate the line if the valve is normally closed.

4. Closed and capped 1 inch or less test valves that are part of the containment isolation boundary fall under the scope of Note 1 and are NRS.

**EXCERPT FROM DRAFT REVISION TO ZA-0001, GQA WORKING GROUP PROCEDURE**

## General Notes

General Notes are used to provide component risk justification, where needed, for similar component types that are treated the same from system to system. Examples include handswitches, indication-only instrumentation, and vent/drain valves. Due to the large number of such components and the similarity of the justification from component to component and from system to system, reference to a general note provides an efficient and consistent method to document the appropriate justification.

An example of a general note is provided below:

| # | SUBJECT | SCOPE | RISK | BASIS |
|---|---|---|---|---|
| 1 | Vent , drain, test valves | 1 inch or less in size | NRS | Normally closed and capped. Gross leakage not credible. Good reliability based on STP and industry experience. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position and ensures that the valve is capped. |

In the example above, the justification for vent valves one inch or less being NRS can be provided simply by referencing this note rather than repeating the detailed justification for each valve. Where a general note is used to justify a risk categorization for a particular component, the note number shall be documented in the "Additional Deterministic Input" column.

General Notes are developed by the GQA Working Group and approved for use by the Expert Panel. They are considered a controlled document and any changes, other than editorial changes, require the approval of the Expert Panel. General Notes are included in their entirety in each RSBD, even though some notes may not be applicable to that system.

ATTACHMENT 2

REVISED DRAFT FSAR SECTION

STPEGS UFSAR 13.7

## 13.7 RISK-INFORMED SPECIAL TREATMENT REQUIREMENTS

### 13.7.1 Introduction

NRC regulations in 10 CFR Parts 21, 50, and 100 contain special treatment requirements that impose controls to ensure the quality of components that are safety-related, important to safety, or otherwise come within the scope of the regulations. These special treatment requirements go beyond normal commercial and industrial practices, and include quality assurance (QA) requirements, qualification requirements, inspection and testing requirements, and Maintenance Rule requirements. STP has been granted an exemption from the special treatment requirements. Table 13.7-1 identifies the regulations from which an exemption was granted and the scope of the exemption. This exemption only pertains to special treatment requirements; it does not change the design and functional requirements for components.

STP has a risk-informed process for categorizing the safety/risk significance of components. This process is described in Section 13.7.2. Components with no or low safety significance have been exempted from the scope of most of the NRC regulations that impose special treatment requirements, and instead are subject to normal industrial and commercial practices. Additionally, components with medium or high safety significance are evaluated for enhanced treatment. Components retain their original regulatory requirements unless they have been recategorized using the process described below. The treatment for the various categories of components is described in Section 13.7.3. As part of this process, STP also performs continuing evaluations and assessments, which are described in Section 13.7.4. Finally, STP applies quality assurance to this process, and controls changes to the process, as described in Section 13.7.5.

### 13.7.2 Component Categorization Process

13.7.2.1 Overview of Categorization Process. The process utilized by STP in categorizing components consists of the following major tasks:

1. Identification of functions performed by the subject plant system.
2. Determination of the risk significance of each system function.
3. Identification of the system function(s) supported by that component.
4. Determination of a risk categorization of the component based on probabilistic risk assessment (PRA) insights (where the component is modeled)
5. Development of a risk categorization of the component based on deterministic insights.
6. Designation of the overall categorization of the component, based upon the higher of the PRA categorization and the deterministic categorization.
7. Identification of critical attributes for components determined to be safety/risk significant.

**The processes for determining the risk categorization and deterministic categorization of a component are described in more detail in Sections 13.7.2.3 and 13.7.2.4.**

**Based upon these processes, a component is placed into one of four categories: 1) high safety/risk significant (HSS), 2) medium safety/risk significant (MSS), 3) low safety/risk significant (LSS), and 4) non-risk significant (NRS). This categorization process does not, in and of itself, affect the other classifications of the component (e.g., safety, seismic, ASME classification).**

**The process is implemented by a Working Group comprised of individuals experienced in various facets of nuclear plant operation and reviewed by an Expert Panel. This integrated decision process is described in more detail in Section 13.7.2.2.**

**13.7.2.2 Comprehensive Risk Management Process. The integrated decision-making process used by STP is controlled by procedure. The integrated decision-making process incorporates the use of an Expert Panel and Working Groups. The Expert Panel is comprised of qualified senior level individuals and is responsible for oversight of the program and for reviewing the activities and recommendations of the Working Group. The Working Group is comprised of experienced individuals who apply risk insights and experience to categorize components in accordance with the process described in this Section and make recommendations to the Expert Panel.**

**The Expert Panel and Working Group have expertise in the areas of risk assessment, quality assurance, licensing, engineering, and operations and maintenance. The combined membership of the Expert Panel and Working Group includes at least three individuals with a minimum of five years experience at STP or similar nuclear plants, and at least one individual who has worked on the modeling and updating of the PRA for STP or similar plants for a minimum of three years.**

**Procedures control the composition of and processes used by the Expert Panel and Working Group. Procedures also identify training requirements for members of the Expert Panel and Working Group, including training on probabilistic risk assessment, risk ranking, and the graded quality assurance process. Finally, the procedures specify the requirements for a quorum of the Expert Panel and Working Group, meeting frequencies, the decision-making process for determining the categorization of components, the process for resolving differing opinions among the Expert Panel and Working Group, and periodic reviews of the appropriateness of the programmatic control and oversight of categorized components.**

**13.7.2.3 PRA Risk Categorization Process. A component's risk categorization is initially based upon its impact on the results of the PRA.**

**STP's PRA calculates both a core damage frequency (CDF) and a large early release frequency (LERF). The PRA models internal initiating events at full power, and also accounts for the risk associated with external events.**

**The PRA configuration control program incorporates a feedback process to update the PRA Model. The updates are segregated into two categories:**

- **The plant operating update incorporates plant design changes and procedure changes that affect PRA-modeled components, initiating event frequency updates, and changes in SSC unavailability that affect the PRA model. These changes will be incorporated into the model on a period not to exceed 36 months.**

- **The comprehensive data update incorporates changes to plant-specific failure rate distributions and human reliability, and any other database distribution updates (examples would include equipment failure rates, recovery actions, and operator actions). This second category will be updated on a period not to exceed 60 months.**

**The PRA model may be updated on a more frequent basis if an update would result in a significant increase in the CDF.**

**Only components that are modeled in the PRA are given an initial risk categorization. The PRA risk categorization of a component is based upon its Fussell-Vessely (FV) importance, which is the fraction of the CDF and LERF to which failure of the component contributes, and its risk achievement worth (RAW), which is the factor by which the CDF and LERF would increase if it were assumed that the component is guaranteed to fail. Specifically, PRA risk categorization is based upon the following:**

| PRA Ranking | Criteria |
|---|---|
| High | RAW ≥ 100.0 or<br>FV ≥ 0.01 or<br>FV ≥ 0.005 and RAW ≥ 2.0 |
| Medium (Further Evaluation is Required) | FV < 0.005 and 100.0 > RAW ≥ 10.0 |
| Medium | FV ≥ 0.005 and RAW < 2.0 or<br>FV < 0.005 and 10.0 > RAW ≥ 2.0 |
| Low | FV < 0.005 and RAW < 2.0 |

**13.7.2.4 <u>Deterministic Categorization Process</u>. Components are subject to a deterministic categorization process, regardless of whether they are also subject to the risk categorization process using PRA insights. This deterministic categorization process can result in an increase, but not a decrease (from the PRA risk), in a component's categorization.**

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**A component's deterministic categorization is directly attributable to the importance of the system function supported by the component. In cases, where a component supports more than one system function, the component is classified based on the highest safety classification of the function supported. In categorizing the functions of a system, the Working Group considers five critical questions regarding the function, each of which is given a different weight. These questions and their weight are as follows:**

| **QUESTION** | **WEIGHT** |
|---|---|
| **Is the function used to mitigate accidents or transients?** | **5** |
| **Is the function specifically called out in the emergency operating procedures (EOPs) or Emergency Response Procedures (ERPs)?** | **5** |
| **Does the loss of the function directly fail another risk-significant system?** | **4** |
| **Is the loss of the function safety significant for shutdown or mode changes?** | **3** |
| **Does the loss of the function, in and of itself, directly cause an initiating event?** | **3** |

**Based on the impact on safety if the function is unavailable and the frequency of loss of the function, each of the five questions is given a numerical answer ranging from 0 to 5. This grading scale is as follows:**

**"0" - Negative response**

**"1" - Positive response having an insignificant impact and/or occurring very rarely**

**"2" - Positive response having a minor impact and/or occurring infrequently**

**"3" - Positive response having a low impact and/or occurring occasionally**

**"4" - Positive response having a medium impact and/or occurring regularly**

**"5" - Positive response having a high impact and/or occurring frequently**

**The definitions for the terms used in this grading scale are as follows:**

**Frequency Definitions –**

- **Occurring Frequently – continuously or always demanded**
- **Occurring Regularly – demanded > 5 times per year**
- **Occurring Occasionally – demanded 1-2 times per cycle**

- **Occurring Infrequently – demanded < once per cycle**
- **Occurring Very Rarely – demanded once per lifetime**

**Impact Definitions** –

- **High Impact – a system function is lost which likely could result in core damage and/or may have a negative impact on the health and safety of the public**

- **Medium Impact – a system function is lost which may, but is not likely to, result in core damage and/or is unlikely to have a negative impact on the health and safety of the public**

- **Low Impact – a system function is significantly degraded, but no core damage and/or negative impact on the health and safety of the public is expected**

- **Minor Impact – a system function has been moderately degraded, but no core damage or negative impact on the health and safety of the public**

- **Insignificant Impact – a system function has been challenged, but no core damage or negative impact on the health and safety of the public**

**Although some of these definitions are quantitative, both of these sets of definitions are applied based on the collective judgment and experience of the Working Group.**

**The numerical values, after weighting, are summed; the maximum possible value is 100. Based on the sum, functions are categorized as follows:**

| SCORE RANGE | CATEGORY |
|---|---|
| 0 – 20 | NRS |
| 21 – 40 | LSS |
| 41 – 70 | MSS |
| 71 – 100 | HSS |

**A function with a low categorization due to a low sum can receive a higher risk classification if any one of their five questions received a high numerical answer. Specifically, a weighted score of 25 on any one question results in an HSS categorization; a weighted score of 15-20 on any one question results in a minimum categorization of MSS;**

**and a weighted score of 9-12 on any one question results in a minimum categorization of LSS. This is done to ensure that a component with a significant risk in one area does not have that risk masked because of its low risk in other areas.**

**In general, a component is given the same categorization as the system function that the component supports. However, a component may be ranked lower than the associated system function.**

General notes are used to document component risk justification, where needed, for similar component types that are treated the same from system to system. Components covered by a general note are evaluated by the Working Group to ensure proper applicability of the note and appropriateness of the risk categorization. The use of general notes is an administrative tool that allows for increased efficiency in the documentation of justifications of large numbers of similar components. General notes are not used for system functions.

**13.7.2.5 Defense in Depth and Safety Margins. For the following reasons, the exemption and the categorization process maintain defense in depth and sufficient safety margins:**

- **Functional requirements and the design configuration of systems are retained.**
- **No existing plant barriers are removed or altered.**
- **Design provisions for redundancy, diversity, and independence are maintained.**
- **The plant's response to transients or other initiators is not affected.**
- **Preventive or mitigative capability of components is preserved.**
- **There is no change in any of the safety analyses in the UFSAR.**
- **Existing safety-related LSS and NRS components will not be replaced, absent good cause (e.g., obsolescence or failure). Since the existing safety-related LSS and NRS components were designed, procured, manufactured, and installed in accordance with the existing special treatment requirements, these components have inherent design margins to perform their intended functions that will not be adversely affected by this exemption.**
- **Normal commercial and industrial practices provide an appropriate and acceptable level of assurance that safety-related LSS and NRS components will be able to perform their intended functions.**
- **The corrective action program is applied to safety-related LSS and NRS components. This program provides reasonable assurance that deficiencies involving safety-related LSS and NRS components will be identified, corrected, and necessary action taken to ensure acceptable performance levels are maintained.**

### 13.7.3 Treatment for Component Categories

**13.7.3.1 Description of Treatment for Component Categories. The following treatment is provided for the various component categories:**

- **Safety-Related HSS and MSS Components – These components continue to receive the treatment required by NRC regulations and STP's associated implementing programs.**

**Some safety-related components may be called upon to perform functions that are beyond the design basis or perform safety-related functions under conditions that are beyond the design basis. STP's PRA does not take credit for such functions unless there is basis for confidence that the component will be able to perform the functions (e.g., the functions are subject to special treatment; demonstrated ability of the component to perform the functions under the specified conditions). Additionally, to the extent that the PRA does credit such functions, the PRA assumes a reduced reliability for the function commensurate with the severity of the beyond design basis conditions in question and the special treatment provided to the function. ~~Therefore, STP does not need to evaluate whether enhanced treatment should be provided to safety-related HSS and MSS components to account for such functions.~~ However, if STP should decide to take credit for such functions beyond that described above, STP would use the process described in Section 13.7.3.2 to evaluate the risk-significant functions performed by these components that are not being treated under STP's current programs, and provide enhanced treatment for such functions.**

- **<u>Non-Safety-Related HSS and MSS Components</u> – These components will continue to receive any existing special treatment required by NRC regulations and STP's implementing programs. Additionally, the risk-significant functions of these components will receive consideration for enhanced treatment. This consideration is described in Section 13.7.3.2.**

- **<u>Safety-Related LSS and NRS Components</u> – These components receive STP's normal commercial and industrial practices. These practices are described in Section 13.7.3.3.**

- **<u>Non-Safety-Related LSS and NRS Components</u> – The treatment of these components is not subject to regulatory control.**

- **<u>Uncategorized Components</u> – Until a component is categorized, it continues to receive the treatment required by NRC regulations and STP's associated implementing programs, as applicable.**

**13.7.3.2 <u>Enhanced Treatment for HSS and MSS Components</u>. Non-safety-related HSS and MSS components may perform risk-significant functions that are not addressed by STP's current treatment programs.**

**When a non-safety-related component is categorized as HSS or MSS, STP documents the condition under the corrective action program and determines whether enhanced treatment is warranted to enhance the reliability and availability of the function. In particular, STP evaluates the treatment applied to the component to ensure that the existing controls are sufficient to maintain the reliability and availability of the component in a manner that is consistent with its categorization. This process evaluates the reliability of the component, the adequacy of the existing controls, and the need for any changes. If changes are needed, additional controls are applied to the component. In addition, the component is placed under the Maintenance Rule monitoring program, if not already scoped in the program (i.e., failures of the component are evaluated and Maintenance Rule**

**Functional Failures (MRFF) involving the component are counted against the performance criteria at the plant/system/train level, as applicable). Additionally, as provided in the approved GQA program, non-safety-related HSS and MSS components are subject to the TARGETED QA program. These controls will be specifically 'targeted' to the critical attributes that resulted in the component being categorized as HSS or MSS. Components under these controls will remain non-safety-related~~ and will be procured commercial~~, but the special treatments will be appropriately applied to give additional assurance that the component will be able to perform its HSS/MSS function when demanded.**

**As discussed in Section 13.7.3.1, STP's PRA does not take credit for the beyond-design basis functions of safety-related components, unless there is a basis for confidence that the component will be able to perform the functions. However, if STP should decide to take credit for a risk-significant function in a situation in which existing special treatment does not provide the applicable level of confidence, STP would use the process described above to evaluate enhanced treatment for the function.**

**These identified processes provide reasonable assurance that HSS and MSS components will be able to perform their safety significant functions.**

13.7.3.3 Normal Commercial and Industrial Practices for Safety-Related LSS and NRS Components

A description of STP's commercial practices is provided below.

13.7.3.3.1 Design Control Process. The Station's Design Control Program is used for safety-related SSCs, including safety-related LSS and NRS SSCs). The Design Control Program complies with 10 CFR Part 50, Appendix B and is described in the Operations Quality Assurance Plan (OQAP).

13.7.3.3.2 Procurement Process. Technical requirements (including applicable design basis environmental and seismic conditions) are specified for items to be procured, which include the original design inputs and assumptions for the item. One or more of the following methods are used to determine that the procured item can perform its safety-related function under design basis conditions, including applicable design basis environmental and seismic conditions:

X Vendor Documentation - The performance characteristics for the item, as specified in vendor documentation (e.g., catalog information, certificate of conformance), satisfy STP's technical requirements.

X Equivalency Evaluation - An equivalency evaluation determines that the procured item is equivalent to the item being replaced (e.g., a like-for-like replacement).

X Engineering Evaluation - An engineering evaluation compares the differences between the procured item and original item and determines that the procured item can perform its safety-related function under design basis conditions.

X Engineering Analysis - In cases involving design changes or substantial differences between the procured item and replacement item, an engineering analysis may be performed to determine that the procured item can perform its safety-related function under design basis conditions. The engineering analysis may be based upon a computer calculation, evaluations by multiple disciplines, test data, or operating experience related to the procured item over its expected life.

X Testing - If none of the above methods are sufficient, commercial testing would be performed on the component. Margins, documentation, and additional assurance specified in NRC regulations would not be required in these tests, since the components are LSS/NRS and do not warrant this additional assurance.

Documentation of the implementation of these methods is maintained. Additionally, documentation is maintained to identify the preventive maintenance needed to preserve the capability of the procured item to perform its safety-related function under applicable design basis environmental and seismic conditions for its expected life.

A Purchase Order is issued to the supplier, which specifies the item to be procured either by catalog identification or procurement specifications, as applicable.

STP uses the following commercial national consensus standards in the procurement process, as necessary to provide confidence that components can perform their safety-related function:

X Standards required by the State of Texas to be used in the process.

~~? Existing standards, in cases where STP has determined at the time of the granting of the exemption that it is appropriate to apply those standards in the process.~~

X ~~Future standards at STP's discretion, either as an additional standard or in lieu of a standard in use at the time of the granting of the exemption.~~

X Standards used at STP for processes or component attributes that are not subject to NRC special treatment requirements.

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

The procurement program provides for the identification and implementation of special handling and storage requirements (if required) to ensure that the item is not damaged or degraded during shipment to the site or during storage on site. These handling and storage requirements consider available recommendations from the vendor. STP may use an alternative to these recommendations if there is a basis for doing so. The basis does not need to be documented.

At the time of receipt, the received item is inspected to ensure that the item was not damaged in the process of shipping, and that the item received is the item ordered.

**13.7.3.3.3 Installation Process. STP uses the following commercial national consensus standards in the installation process, as necessary to provide confidence that components can perform their safety-related function:**

X **Standards required by the State of Texas to be used in the process.**

~~? Existing standards, in cases where STP has determined at the time of the granting of the exemption that it is appropriate to apply those standards in the process.~~

~~? Future standards at STP's discretion, either as an additional standard or in lieu of a standard in use at the time of the granting of the exemption.~~

X Standards used at STP for processes or component attributes that are not subject to NRC special treatment requirements.

**STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.**

**Appropriate testing is performed if the installation could affect an SSC's safety-related function. The test verifies that the SSC is operating within expected parameters and is functional. The testing may necessitate that the SSC be placed in service to validate the acceptance of its performance. Testing is not necessarily performed under design basis conditions.**

**13.7.3.3.4 Maintenance Process. Preventive maintenance tasks are developed for active structures, systems, or components factoring in vendor recommendations. STP may use an alternative to these recommendations if there is a basis for doing so. The basis does not need to be documented.**

The frequency and scope of predictive maintenance actions are established and documented based on various considerations such as vendor recommendations, environmental operating conditions, safety significance, and operating performance history. STP may deviate from vendor recommendations based on specific circumstances and sound business practices. Such deviations are not required to be documented.

**When an SSC deficiency is identified, it is documented and tracked through the Corrective Action Program. The deficiency is evaluated to determine the appropriate corrective maintenance to be performed.**

Following maintenance activities that affect the capability of a component to perform its safety-related function, appropriate ~~P~~**post maintenance testing**~~, as required,~~ **is performed** ~~to provide an appropriate level of assurance~~ to provide confidence **that the SSC is performing within expected parameters** ~~prior to being returned to service~~**.**

**STP uses the following commercial national consensus standards in the maintenance process, as necessary to provide confidence that components can perform their safety-related function:**

**X Standards required by the State of Texas to be used in the process.**

**? ~~Existing standards, in cases where STP has determined at the time of the granting of the exemption that it is appropriate to apply those standards in the process.~~**

**X ~~Future standards at STP's discretion, either as an additional standard or in lieu of a standard in use at the time of the granting of the exemption.~~**

**X Standards used at STP for processes or component attributes that are not subject to NRC special treatment requirements.**

**STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.**

**13.7.3.3.5 Inspection,Test, and Surveillance Process. The Station's inspection and test process is primarily addressed and implemented through the Maintenance process. As stated above, the Maintenance process addresses inspections and tests through corrective, preventive, and predictive maintenance activities. These activities factor in vendor recommendations into the selected approach. STP may use an alternative to these recommendations if there is a basis for doing so. The basis does not need to be documented.**

**~~ASME pumps and valves are subject to routine operation or periodic tests to provide confidence that they can perform their safety-related function under design basis conditions. This includes one or more of the following:~~**

**? ~~Components Subject to Routine Operation - Running of the pump or actuation of the valve during normal operation, system alignment changes, or mode changes.~~**

**? ~~Components Not Subject to Routine Operation - Testing of the pump or valve using: 1) the inservice test (IST) approach specified in 10 CFR 50.55a(f), but at a reduced frequency and without the other special treatment required by that section; or 2) an approach that is different than the IST approach specified in 10 CFR 50.55a(f) but still sufficient to provide confidence that the component has not failed.~~**

**~~Such operation and testing do not need to be conducted under design basis conditions.~~**

**For ASME pumps and valves, the inspection, test, and surveillance process provides data/information that allows insights of operating characteristics sufficient to conclude that the component will likely satisfy its functional requirements.**

**STP uses the following commercial national consensus standards in the inspection, test, and surveillance process, as necessary to provide confidence that components can perform their safety-related functions:**

X Standards required by the State of Texas to be used in the process.

~~? Existing standards, in cases where STP has determined at the time of the granting of the exemption that it is appropriate to apply those standards in the process.~~

X ~~Future standards at STP's discretion, either as an additional standard or in lieu of a standard in use at the time of the granting of the exemption.~~

X Standards used at STP for processes or component attributes that are not subject to NRC special treatment requirements.

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

13.7.3.3.6 Corrective Action Program. The Station's Corrective Action Program is used for both safety-related (LSS and NRS as well as HSS and MSS SSCs) and non-safety-related applications. The Corrective Action Program complies with 10 CFR Part 50 Appendix B, and is described in the OQAP.

13.7.3.3.7 Management and Oversight Process. The Station's management and oversight process is accomplished through approved procedures and guidelines. This process includes independent oversight, line self-assessments, and Maintenance Rule implementation (system or train level for LSS and NRS). In addition, the Graded Quality Assurance Working Group periodically assesses SSC performance.

Procedures provide for the qualification, training, and certification of personnel, commensurate with the functions they perform. Experienced personnel may be exempted from prerequisite training. STP considers vendor recommendations in the training, qualification, and certification of personnel. STP may use an alternative to these recommendations if there is a basis for doing so. The basis does not need to be documented. Additionally, STP uses the following commercial national consensus standards for qualification, training, and certification of personnel, as necessary to provide confidence that components can perform their safety-related function:

X Standards required by the State of Texas to be used in the process.

~~? Existing standards, in cases where STP has determined at the time of the granting of the exemption that it is appropriate to apply those standards in the process.~~

X ~~Future standards at STP's discretion, either as an additional standard or in lieu of a standard in use at the time of the granting of the exemption.~~

X Standards used at STP for processes or component attributes that are not subject to NRC special treatment requirements.

STP does not need to itemize the standards in use at STP or to perform an evaluation of all national consensus standards.

**Documentation, reviews, and record retention requirements for completed work activities are governed by Station procedures.**

**Procedures identify the types of inspection, test, and surveillance equipment requiring control and calibration, and the interval of calibration. Equipment that is found to be in error or defective is removed from service or properly tagged to indicate the error or defect, and a determination is made of the functionality of the HSS/MSS SSCs that were checked using that equipment.** If the functionality of HSS/MSS SSCs is affected, a determination is also made of the functionality of the LSS/NRS components that were checked using that equipment.

**13.7.3.3. 8 Configuration Control Process. The Station's configuration control process is controlled through approved procedures and policies. The design control process ensures that the configuration of the Station is properly reflected in design documents and drawings.**

**13.7.4 Continuing Evaluations and Assessments**

**13.7.4.1 Performance Monitoring. STP has performance monitoring processes for the changes in the special treatment. This monitoring includes the following:**

- **Maintenance Rule Program – Specific performance criteria are identified at the plant, system, or train level. Regardless of their risk categorization, components that affect MSS or HSS functions will be monitored and assessed in accordance with plant, system and/or train performance criteria.**
- **Performance Reporting & Identification Database – This database collects both positive and negative indicators from the performance of plant activities, such as corrective maintenance, installation of modifications, and conduct of testing. The Quality organization provides oversight of this database.**
- **Corrective Action Program - Condition reports document degraded equipment performance or conditions, including conditions identified as a result of operator rounds, system engineer walk-downs, and corrective maintenance activities.**

**13.7.4.2 Feedback and Corrective Action. STP has feedback and corrective action processes to ensure that equipment performance changes are evaluated for impact on the component risk categorization, the application of special treatment, and other corrective actions. At least once per cycle, performance data is compiled and presented to the Working Group for review, which is performed for each risk-categorized system. Performance and reliability data are generally obtained from sources such as the Maintenance Rule Program and Operating Experience Review.**

**This process provides an appropriate level of assurance that any significant negative performance changes that are attributed to the relaxation of special treatment controls are addressed in a timely manner. Responsive actions may include the reinstatement of applicable controls up to and including the re-categorization of the component's risk significance, as appropriate.**

**13.7.4.3 Process for Assessing Aggregate Changes in Plant Risk. The Expert Panel is responsible for assessing and approving the aggregate effect on plant risk for risk-informed applications.**

**The process used to access the aggregate change in plant risk associated with changes in special treatment for components is based on periodic updates to the station's PRA and the associated PRA risk ranking sensitivity studies.**

**13.7.5 Quality Assurance and Change Control for the Risk-Informed Process**

**13.7.5.1 Quality Assurance for the PRA and Categorization Process.**

**STP has a PRA configuration control program, which is structured to ensure that changes in plant design and equipment performance are reflected in the PRA as appropriate. The PRA configuration control process is controlled by procedures and guidelines that ensure proper control of changes to the models.**

**13.7.5.2 Regulatory Process for Controlling Changes. Changes affecting Section 13.7 will be controlled in accordance with the following provisions:**

- **Changes in the Component Categorization Process as described in Section 13.7.2 may be made without prior NRC approval, unless the change would decrease the effectiveness of the process in identifying HSS and MSS components.**

- **Changes in the Treatment of Component Categories as described in Section 13.7.3 may be made without prior NRC approval, unless the change would result in more than a minimal reduction in the assurance of component functionality.**

- **Changes in the Continuing Evaluations and Assessments as described in Section 13.7.4 may be made without prior NRC approval, unless the change would result in more than a minimal decrease in effectiveness of the evaluations and assessments.**

**STP shall submit a report, as specified in 10 CFR 50.4, of each change made without prior NRC approval pursuant to these provisions. The report shall identify each change and summarize the basis for the conclusion that the change does not involve either a**

**decrease/reduction in effectiveness as described above. The report shall be submitted within 60 days of approval of the change.**

**TABLE 13.7-1**

**EXEMPTIONS FROM SPECIAL TREATMENT REQUIREMENTS**

| Regulation | Scope of Exemption |
|---|---|
| **10 CFR 21.3 – An exemption to exclude safety-related LSS and NRS components from the scope of the definition of "basic component."** | **The procurement, dedication, and reporting requirements in Part 21 are not applied to safety-related LSS and NRS components.** |
| **10 CFR 50.34(b)(11) – An exemption to the extent that it incorporates seismic qualification requirements in Part 100.** | **Refer to request for exemption from Part 100.** |
| **10 CFR 50.49(b) – An exemption to exclude LSS and NRS components from the scope of electric equipment important to safety for the purposes of environmental qualification of electrical equipment.** | • **The qualification documentation and files specified in Section 50.49 are not applicable to LSS and NRS components.**<br>• **LSS and NRS components are not required to be maintained in a qualified condition under Section 50.49.**<br>• **LSS and NRS components may be replaced with components that are not qualified under Section 50.49.**<br>• **LSS and NRS components, as applicable under Section 50.49, are designed to function in the applicable design basis environment. Section 13.7.3.3 identifies the design and procurement controls that are applied to LSS and NRS components to achieve this requirement.** |
| **10 CFR 50.55a(f) and (g) – An exemption from the requirements of ASME Section XI, for repair and replacement of ASME Class 2 and 3 safety-related LSS and NRS components, subject to the provisions identified in the scope of exemption.** | **ASME Class 2 and 3 safety-related LSS and NRS components may be repaired or replaced with components that meet one of the following alternatives:**<br>• **The repair or replacement item will meet the technical (but not the administrative) requirements of the ASME Construction Code, as incorporated in Section XI.**<br>• **The repair or replacement item will meet the technical requirements of another nationally-recognized code or standard suitable for the item.**<br>• **The repair or replacement item will meet the following requirements: *Configuration, pressure temperature rating, and materials*: The repair or replacement item will meet the requirements for configuration, pressure-temperature rating, and stress allowables of the original ASME Construction Code. Additionally, the material will be the same ASME Section II** |

| Regulation | Scope of Exemption |
|---|---|
| | specification, grade, type, class, alloy, and heat-treated condition, as applicable, as the original item. If an alternative material is selected, the original design report shall be reconciled with the ASME Code, Section III stress allowables for the material. Substitution of an ASTM material specification for an ASME material specification is acceptable as long as the specifications are identical (except for editorial differences). *Castings and Joints*: The ASME Construction Code identifies specific non-destructive examinations (NDE) for castings with quality factors and for joints with efficiency factors. This NDE will be performed, or STPNOC will perform an evaluation that reconciles the elimination of this NDE or the use of an alternative NDE. *Other fabrication, examination and testing requirements*: The repair or replacement item will meet the other fabrication, examination, and testing requirements of a nationally-recognized code or standard.<br>Section 13.7.3.3 identifies the quality, design and procurement controls that are applied to safety-related LSS and NRS components that are repaired or replaced. |
| 10 CFR 50.55a(f) – An exemption from meeting the requirements of ASME Section XI for testing of safety-related LSS and NRS components. | Safety-related LSS and NRS components are not in the scope of component-specific inservice testing requirements. System-level testing requirements continue to be applied. Additionally, Section 13.7.3.3 identifies other controls that are applied to ensure the functionality of safety-related LSS and NRS components. |
| 10 CFR 50.55a(g) – An exemption from meeting the requirements of ASME Section XI for inspection of safety-related LSS and NRS components, subject to the provisions in the Scope of Exemption. | Safety-related LSS and NRS components are not in the scope of component-specific inservice inspection requirements. Section 13.7.3.3 identifies controls that are applied to ensure the functionality of safety-related LSS and NRS components. For ASME Class 1 and 2 components, the exemption from 10 CFR 50.55a(g) is limited to piping and supports, and their categorization is based upon the higher of the categorizations determined by the process discussed in Section 13.7.2 or the risk-informed inservice inspection categorization process for associated piping accepted by NRC for STP under NRC Regulatory Guide 1.178. |
| 10 CFR 50.55a(h) – An exemption to exclude safety-related LSS and NRS components from the scope of components required to meet sections 4.3 and 4.4 of IEEE 279. | Sections 4.3 and 4.4 of IEEE 279 do not apply to safety-related LSS and NRS components. The other requirements listed in IEEE 279, including functional and design requirements, are applicable. Additionally, Section 13.7.3.3 identifies other controls that are applied to ensure |

| Regulation | Scope of Exemption |
|---|---|
| | the functionality of safety-related LSS and NRS components. |
| 10 CFR 50.59(a)(1), (a)(2) and (b)(1) (pre-1999 version); 10 CFR 50.59(c)(1), (c)(2), and (d)(1) (2000 version) – An exemption from the requirement to perform a written evaluation of changes in special treatment requirements for LSS and NRS components. Also an exemption from the requirement to seek prior NRC approval for such changes to the extent that they fall within the listed criteria in 50.59. | STP is not required to perform 50.59 evaluations for changes in the special treatment requirements for LSS and NRS components, and is not required to seek prior NRC approval for those changes. The exemption is limited to changes in special treatment requirements for which the exemption has been granted. |
| 10 CFR 50.65(b) – An exemption to exclude LSS and NRS components from the scope of SSCs covered by the Maintenance Rule (except for 10 CFR 50.65(a)(4)). | • STP is required to monitor performance on a plant/system/train level, as applicable. As applicable, STP evaluates failures of LSS and NRS components to determine whether such failures affect MSS or HSS function(s) which then constitute a maintenance rule functional failure at the applicable plant/system/train level. |
| 10 CFR Part 50 Appendix B, Introduction – An exemption to exclude safety-related LSS and NRS components from the scope of safety-related SSCs covered by Appendix B (except for Criterion III pertaining to Design Control and Criteria XV and XVI governing non-conformances and corrective actions). | • Safety-related LSS and NRS components are not required to satisfy the QA requirements in Appendix B, except for design control, control of nonconformances, and corrective action.<br>• Section 13.7.3.3 identifies other controls that are applied to ensure the functionality of safety-related LSS and NRS components. |
| 10CFR Part 50, Appendix J, B.III – An exemption to exclude safety-related LSS and NRS components, subject to the additional limitations listed under Scope of Exemption, from the scope of components requiring local leak rate tests and containment isolation valve leak rate tests. | • Local leak rate tests of LSS containment isolation valves and other safety-related LSS or NRS components are not required. With respect to LSS containment isolation valves, this exemption only applies to valves that satisfy one or more of the following criteria:<br>- The valve is not required to operate (i.e., open) under accident conditions to prevent or mitigate core damage events (e.g., CC-MOV-0057, Component Cooling Water to Reactor Containment Fan Coolers).<br>- The valve is normally closed and in a physically closed, water-filled system (e.g., containment |

| Regulation | Scope of Exemption |
|---|---|
| | isolation valves in the Demineralized Water system)<br>- The valve is in a physically closed system whose piping pressure rating exceeds the containment design pressure rating and that is not connected to the reactor coolant pressure boundary (e.g., containment isolation valves in the Main Feedwater system).<br>- The valve is in a closed system whose piping pressure rating exceeds the containment design pressure rating, and is connected to the reactor coolant pressure boundary. The process line between the containment isolation valve and the reactor coolant pressure boundary is non-nuclear safety (i.e., the valve itself would have been classified as non-nuclear safety were it not for the fact that it penetrates the containment building). An example is the Safety Injection accumulator nitrogen supply valve.<br>- The valve size is 1 inch NPS or less (i.e., by definition the valve failure does not contribute to large early release).<br>• Cumulative limits for containment leakage are based upon the tested components, with the assumption that the exempted components contribute zero leakage.<br>• Section 13.7.3.3 identifies controls that are applied to ensure the functionality of safety-related LSS and NRS components. |
| 10 CFR Part 100, Appendix A.VI(a)(1) and (2) – An exemption to exclude safety-related LSS and NRS components from the scope of SSCs covered by these sections, to the extent that these sections require testing and inspection to demonstrate that SSCs are designed to withstand the safe shutdown earthquake and operating basis earthquake. | • LSS and NRS components are not required to be maintained in a qualified condition under Part 100.<br>• LSS and NRS components may be replaced with components that are not qualified under Part 100.<br>• LSS and NRS components, as applicable under Part 100, are designed to withstand the effects of design basis seismic events without loss of capability to perform their safety function. Section 13.7.3.3 identifies the design and procurement controls that are applied to LSS and NRS components to achieve this requirement. |

March 12, 2001

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

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

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - DRAFT INFORMATION PROVIDED BY LICENSEE ON FEBRUARY 28, 2001, FOR RESOLUTION OF OPEN ITEMS FROM DRAFT SAFETY EVALUATION (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. As part of that process, the NRC staff issued a draft safety evaluation on November 15, 2000. Currently, the staff is working with STPNOC to resolve the open and confirmatory items from the draft safety evaluation. The NRC staff is participating in periodic teleconferences to discuss the resolution of the open and confirmatory items. 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 provide the draft information provided by the licensee to facilitate discussions on the resolution of several open items based on comments made by the staff during a February 15 - 16, 2001, meeting with the licensee. Attachment 1 provides a draft revised response to open item 3.6. Attachment 2 provides a draft revision to the proposed Final Safety Analysis Report section documenting the categorization, treatment, and evaluation and assessment processes that will be used as the basis for any exemptions granted.

Attachments: As stated

Docket Nos. 50-498 and 50-499

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