Enclosure 3

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STPNOC Handout Material

South Texas Project/Nuclear Regulatory Commission Meeting

Remaining Open Issues on the Request for Exemption from Special Treatment Requirements

Meeting of the Risk-Informed Licensing Panel

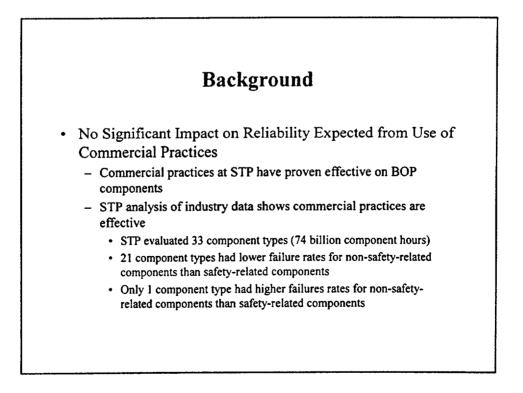
April 24, 2001

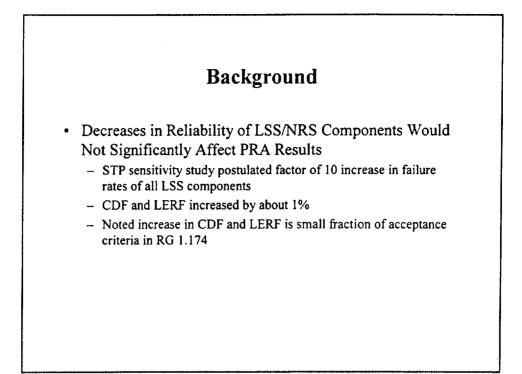
South Texas Project Attendees

- Joe Sheppard, Vice President of Engineering & Technical Services
- Glen Schinzel, Exemption Request Project Manager
- Scott Head, Licensing Manager
- Rick Grantom, Risk Management Manager
- Steve Frantz, STP counsel

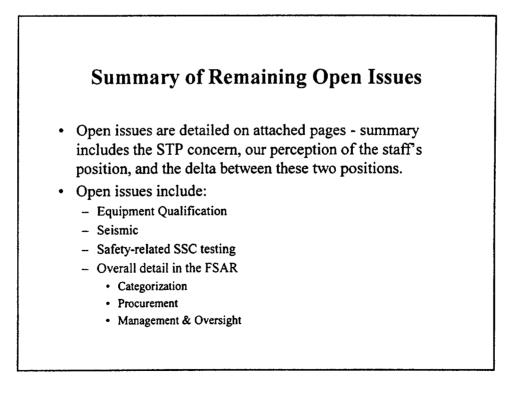
Background

- STP Has a Robust Categorization Process
 - PRA and Importance Measures
 - Deterministic Evaluation
 - Higher of PRA or Deterministic Category Is Used
- LSS/NRS Components Have Little or No Safety Significance
 - Typical examples include vents, drain valves, indicators, etc.
 - Little or no contribution to accident prevention or mitigation





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Summary of Remaining Open Issues

- Pressure boundary categorization

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- Guidance provided in SER on what constitutes effective implementation

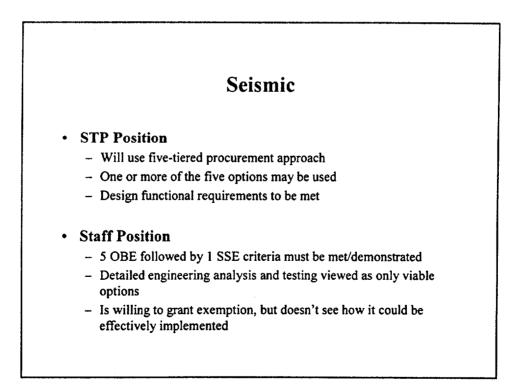
Environmental Qualification

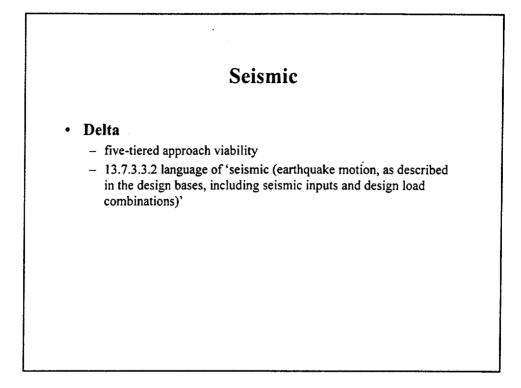
- STP Position
 - Will use five-tiered procurement approach
 - One or more of the five options may be used
 - Will ensure that design functional requirements are met

• Staff Position

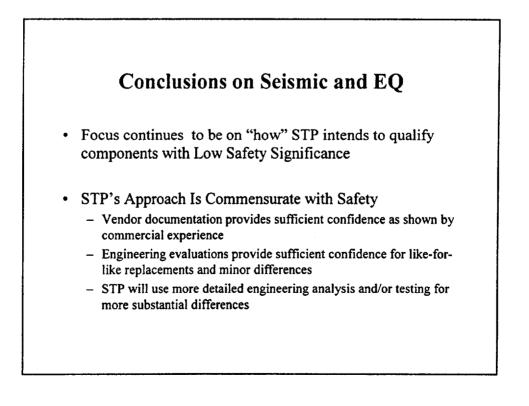
- Official staff position has not been received
- Design basis environmental parameters detailed in FSAR
- NRC has indicated that a combination of calculations, multiple discipline analysis, test data, and operating experience must be used

Environmental Qualification Delta The formal staff position is not known It is not clear that the staff will permit procurement to be satisfied by vendor documentation, equivalency evaluations, engineering evaluations Detail in the FSAR is too prescriptive



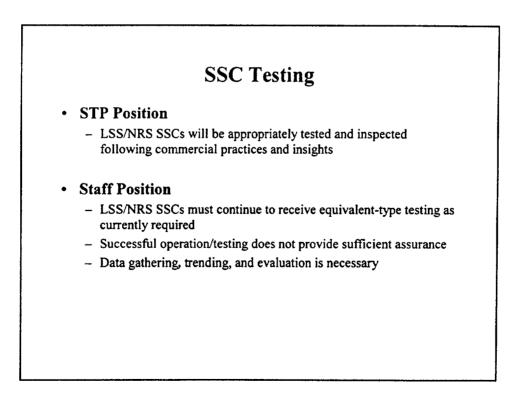


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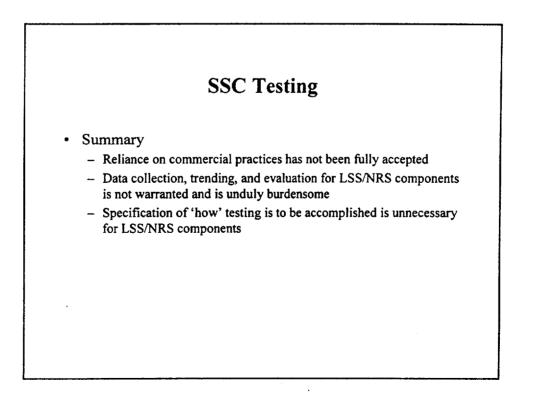
Conclusions on Seismic and EQ Summary Reduced assurance is not apparent with respect to EQ and seismic qualification of LSS/NRS components Absent relief, the exemption will provide essentially no cost savings for procurement

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SSC Testing

- Delta
 - Whether data collection, trending, and evaluation should be performed
- STP's Approach Is Commensurate with Safety
 - STP has agreed to exercise ASME pumps and valves during normal operation or test periodically
 - These activities will demonstrate that the pumps and valves are functional
 - Any failures will be subject to STP's Appendix B Corrective Action Program



Detail in the FSAR

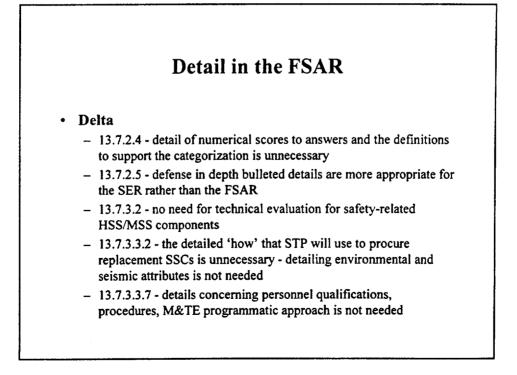
• STP Position

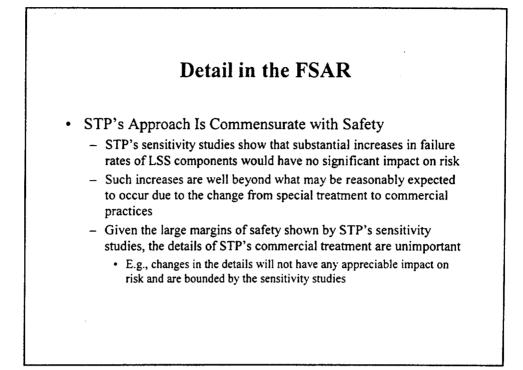
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- New NRC guidance to focus on 'whats' and not the 'hows'
- Extensive detail had been provided to support closure of RAIs and Open Items
- FSAR continues to become more detailed

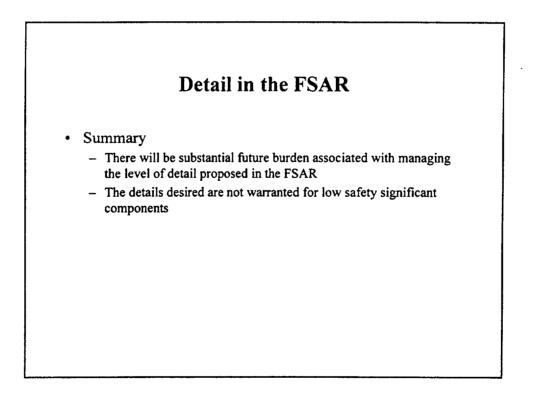
Staff Position

- Current detail in FSAR 13.7 reflects the minimum detail needed to make a finding in the SER
- Additional detail is needed on containment integrity sensitivity study, pressure boundary, etc.





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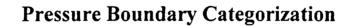


Pressure Boundary Categorization

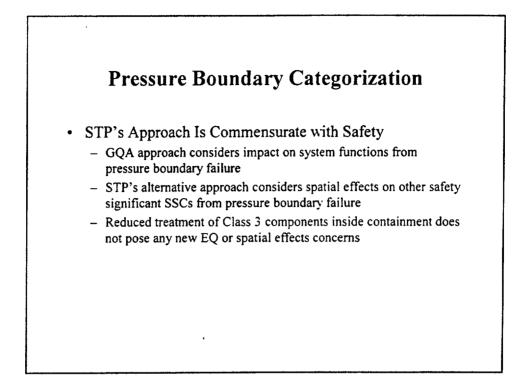
• STP Position

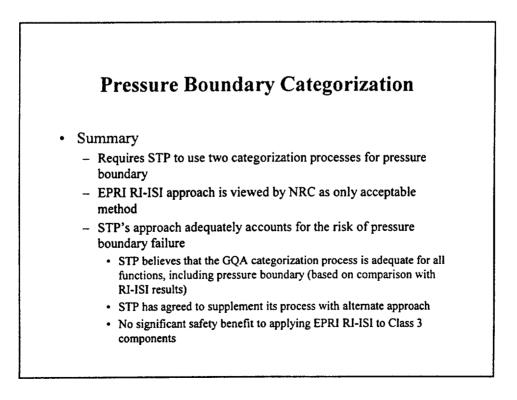
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- GQA approach conservatively categorizes pressure boundary
- RI-ISI methodology supplements the ASME Class 1/2 categorization
- Streamlined RI-ISI-type approach supplements ASME Class 3 categorization
- Staff Position
 - GQA categorization inadequate for pressure boundary
 - RI-ISI categorization must be used to supplement categorization for ASME Repair and Replacement for all ASME classes



- Delta
 - Whether STP should be allowed to use alternate approach to supplement categorization for ASME Class 3 components
- Class 3 components
 - Class 3 components have the least important pressure boundary considerations
 - Currently, NRC regulations have only minimal inspection requirements for Class 3 components
 - Would impose substantial additional burden on STP with respect to categorization of Class 3 components





Implementation Guidance in SER

• Staff Position

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Implementation guidance is needed to give insight to STP on staff's expectations

STP Position

- Commercial practices are sufficient
- Detailed guidance on what constitutes 'effective implementation' or 'ineffective implementation' in the SER will establish expectations that go beyond commercial practices
- Guidance becomes default 'commitments' that limit implementation



 STP will not have an opportunity to comment on the guidance before it appears in the final SER

- Delta
 - Resolve whether guidance should be provided in the SER
- Summary
 - It is inappropriate for NRC to place guidance in the SER without providing STP a prior opportunity to review and comment
 - The staff's proposal threatens to impose new requirements that could impact the viability of the exemption

Future Activities

- What should be NRC's inspection approach to LSS/NRS components?
- Process should proceed as a pilot and learn from feedback that is received
- STP does not expect any significant changes in reliability of LSS/NRS components
- STP's sensitivity studies demonstrate that even a postulated 10 fold increase in failure rates would not significantly affect risk
- LSS/NRS components do not warrant substantial NRC inspection resources

