January 31, 2002

LICENSEE: South Texas Project Nuclear Operating Company (STPNOC)

FACILITY: South Texas Project Units 1 and 2

SUBJECT: SUMMARY OF MEETING WITH STPNOC REGARDING RISK-INFORMED

TECHNICAL SPECIFICATIONS FOR SOUTH TEXAS PROJECT, UNITS 1

AND 2

On December 11, 2001, the STPNOC met with the U. S. Nuclear Regulatory Commission (NRC) Headquarter's staff, with Region IV staff participating by telephone, to discuss STPNOC's proposal to develop risk-informed technical specifications (TSs) for South Texas Project (STP), Units 1 and 2. Enclosure 1 is the list of attendees.

The STPNOC presented its approach to developing risk-informed TSs for STP, Units 1 and 2. Enclosure 2 contains the viewgraphs of STPNOC presentation. The STPNOC recommended that the STP, Units 1 and 2 proposal serve as a pilot for the industry, and the fees for the review of the forthcoming proposals be waived.

The NRC staff stated that the STPNOC proposal was comprehensive and had merit to be considered as a pilot for the industry. The NRC staff raised several issues for the licensee to consider. The NRC staff suggested that in proceeding with STP risk-informed TSs as an industry pilot, STPNOC should keep in touch with the industry efforts such as Nuclear Energy Institute (NEI's) efforts on regulatory information tracking system initiatives, Electric Power Research Institute's activities (Risk-Informed Integrated Safety Management Specifications), and other stakeholders' efforts on individual risk-informed TS changes.

There was a considerable discussion between the NRC staff and the STPNOC staff. Following are some of the important issues raised during the discussion. The back stop for TSs' limits requires careful consideration and clear explanation. The STPNOC use of the 30-day backstop appeared to the NRC staff to be high. The use of functionality should be reconciled with the use of operablity under the Maintenance Rule. The criteria used for selection of limits for configuration risk management program thresholds need to be carefully discussed. The STPNOC proposal for the treatment of limiting condition for operation 3.0.3 differs from what the NEI is proposing. This will require further discussions. It will be necessary to be mindful of the instantaneous core damage frequency (CDF) in addition to incremental CDF, in order to correctly reflect the risk significance, and ensure defense in depth.

The STPNOC was asked to consider the above issues for discussions during future telephone conferences and meetings, as appropriate.

/RA/

Mohan C. Thadani, Senior Project Manager, Section 1 Project Directorate IV Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures: 1. List of Attendees

2. Viewgraphs

cc w/encls: See next page

The STPNOC was asked to consider the above issues for discussions during future telephone conferences and meetings, as appropriate.

/RA/

Mohan C. Thadani, Senior Project Manager, Section 1 Project Directorate IV Division of Licensing Project Management Office of Nuclear Reactor Regulation

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Enclosures: 1. List of Attendees

2. Viewgraphs

cc w/encls: See next page

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Enclosure 2: ML020300323

MEETING NOTICE: ML013300327 PACKAGE: ML020300132

ACCESSION NUMBER: ML020300444

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NRC MEETING WITH STP NUCLEAR OPERATING COMPANY DECEMBER 11, 2001

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