



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

December 27, 2003  
NOC-AE-03001654  
10CFR170

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Request for Fee Waiver as Regulatory Guide 1.200 Pilot Plant

Reference: Letter dated March 18, 2003 from Scott M. Head to NRC Document Control Desk, "Letter of Intent to Submit a Broad-Scope Risk-Informed Technical Specification Amendment Request" (NOC-AE-03001458)

In the referenced letter STP Nuclear Operating Company (STPNOC) proposed to submit a risk-informed set of Technical Specification changes.

STPNOC proposes this application as a pilot for Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities", and its associated Standard Review Plan Section 19.1. This risk-informed TS amendment request is a highly suitable and appropriate candidate for evaluating the process described in RG 1.200 for determining application specific PRA quality. It is expected that this pilot effort will result in substantial benefit to both current and future nuclear power plants.

STP's proposed application will apply the STP Probabilistic Risk Assessment (PRA) program to calculate the changes in risk (i.e., CDF, LERF) from the actual plant configuration. By comparing the calculated risk to pre-determined risk thresholds, the configuration risk management program will be capable of providing both a technical basis and robust calculation of an acceptable configuration-specific allowed outage time. The Configuration Risk Management Program (CRMP) will be the same tool that is currently used to perform the assessment of plant risk required by 10CFR50.65(a)(4). The referenced correspondence describes the proposed application in detail.

The NRC indicated in a November 19, 2003 memorandum from Jesse L. Funches to Jame E. Dyer and Ashok C. Thadani that review of pilot applications for DG-1122 (issued as RG 1.200) is eligible for waiver of review fees in accordance with 10 CFR Part 170.11(b)(1). As in the referenced letter, STPNOC requests that the review fees be waived for this application. STPNOC understands that the fee waiver would extend to the entire review of the proposed license amendment.

STPNOC plans to submit the proposed license amendment by June 30, 2004. NRC approval is requested by June 30, 2005.

If you have any questions, please call Wayne Harrison at 361-972-7298 or me at 361-972-7136.



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cc:

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