

AG

**From:** Michael Webb  
**To:** Schinzel, Glen  
**Date:** 5/21/04 3:10PM  
**Subject:** STP Characterization Process

Glen,

I have attached comments that were forwarded to me by the staff of the Safety Programs Section of the Probabilistic Safety Assessment Branch regarding the South Texas Project characterization process as discussed in STP letters dated October 7, 2003, and March 4 and 16, 2004.

After you and your colleagues have had a chance to evaluate them, we can set up a call to discuss them further. We will target late morning on Tuesday, June 1st, as a possible time for the call.

Thanks,  
Mike Webb  
NRC Project Manager for South Texas Project  
301-415-1347

**CC:** crgrantom@stpegs.com; Head, Scott

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STP, Units 1 and 2  
Dockets  
50-498  
499  
PM: Michael Webb

**Mail Envelope Properties** (40AE5431.2A6 : 5 : 21368)

**Subject:** STP Characterization Process  
**Creation Date:** 5/21/04 3:10PM  
**From:** Michael Webb

**Created By:** MKW@nrc.gov

Recipients	Action	Date & Time
nrc.gov		
owf2_po.OWFN_DO	Delivered	05/21/04 03:10PM
SCD1 BC (Stephen Dinsmore)	Opened	05/21/04 03:10PM
nrc.gov		
owf4_po.OWFN_DO	Delivered	05/21/04 03:10PM
MKW BC (Michael Webb)	Opened	05/21/04 03:11PM
stpegs.com	Transferred	05/21/04 03:10PM
crgrantom CC (crgrantom@stpegs.com)		
geschinzel (Schinzel, Glen)		
smhead CC (Head, Scott)		

Post Office	Delivered	Route
owf2_po.OWFN_DO	05/21/04 03:10PM	nrc.gov
owf4_po.OWFN_DO	05/21/04 03:10PM	nrc.gov
		stpegs.com

Files	Size	Date & Time
STPCategorization.wpd	10229	05/21/04 02:56PM
MESSAGE	1377	05/21/04 03:10PM

**Options**

**Auto Delete:** No  
**Expiration Date:** None  
**Notify Recipients:** Yes  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**To Be Delivered:** Immediate  
**Status Tracking:** Delivered & Opened

## Change to South Texas Project's Categorization process

### Change 1, Letter October 7, 2003, Clarification of the up-date interval

The procedural change clarifies the difference between updating the PRA, re-calculating the SSC risk-rankings with the PRA, and finalizing the risk-rankings in the Working group. All the PRA manipulations, including recalculations of the SSCs risk-rankings are done on the 36 month schedule. The working group must review and approve the SSC rankings and incorporate any changed rankings into the implementation documentation and processes. This is to be done in a "timely manner" after recalculating the SSCs risk rankings.

#### Evaluation:

The original documentation could be interpreted to require that the WG needed to complete the review, approve, and incorporation of the new SSC rankings into the implementation processes by the end of the 36 month interval. STP correctly notes that this would require a less than 36 month update schedule for the PRA because it takes some months for the WG to complete its work.

The 36 month interval is not a derived value but a selected value intended to assure that periodic updates are performed. Allowing some extra time to incorporate and change into the processes does not defeat the intent of periodic updates.

#### Conclusion:

This clarification is reasonable.

### Change 2, Letter March 4, 2004, Change in how the out-of-service for maintenance sensitivity study is conducted.

Initially, all the SSCs that might be out for maintenance were set in an unavailable state and the risk-ranking of all other SSCs evaluated. This illustrates the safety significance of the population of SSCs during the maintenance activities. The licensee will now increase the unavailability of the SSCs that might be out for maintenance by a factor of ten instead of setting them to unavailable.

#### Evaluation:

As noted in the licensee's letter the SE states that "equipment planned to be out of service.. Is set to unavailable." The licensee process no longer complies with this statement. Further discussion with the license is warranted to clarify what the sensitivity study was intended to investigate and how the old and new method supports this investigation.

**Change 3: Letter dated March 16,2004, Change in the use of quantitative sensitivity study results in the categorization process.**

After approval of the GQA program, all SSCs were placed in the highest safety-significance category indicated by the base line results and all of the sensitivity studies. The expert panel was not authorized to reduce the ranking. STP now ranks the SCC according to its baseline ranking and provides the results of the sensitivity study for consideration by the expert panel in case they want to increase the significance.

**Evaluation;**

Both the GQA RG and the staff's SE allow for the placement of the SSC in the safety-significance of the base-line result, and providing the expert panel with the results of the sensitivity studies for their consideration.

**Conclusion:**

The change results in a process that fully comports with the authorized process instead of the more conservative process that was used earlier.

