

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

July 13, 2005 NOC-AE-05001883 10CFR50.54(f)

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

South Texas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Response to a Request for Additional Information Regarding the 60 Day Response to Bulletin 2003-01: "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors (TAC Nos. MB9615 and MB9616)

- References: 1. Letter, Thomas J. Jordan to NRC Document Control Desk, "60-day response to NRC Bulletin 2003-01," dated August 7, 2003 (NOC-AE-03001569)
  - 2. Letter, Thomas J. Jordan to NRC Document Control Desk, "Request for additional Information Regarding Bulletin 2003-01, Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors Dated November 11, 2004 (NOC-AE-04001793).

Attachment 1 of this letter is in response to a request for additional information from the NRC staff regarding the STP Nuclear Operating Company's 60 Day Response to Bulletin 2003-01.

There are no commitments contained in this letter.

If there are any questions regarding this response, please contact Scott Head at (361) 972-7136 or me at (361) 972-7902.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 13, 2005

Vice President, Engineering

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Attachment1: Response to a Request for Additional Information Regarding the 60 Day Response to Bulletin 2003-01.

STI: 31880802

cc: (paper copy)

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Jack A. Fusco Michael A. Reed Texas Genco, LP Response to a Request for Additional Information Regarding the 60 Day Response to Bulletin 2003-01: "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors

1. Has WOG COA A1a been rejected by STP? (WOG COA A1a is securing of one containment spray pump prior to recirculation).

## STP Response:

STP has not rejected WOG COA A1a. STP is a three-train plant and has three Containment Spray (CS) Pumps. Based on single failure criteria, one out of the three CS Pumps may be secured and still meet the current design basis.

Therefore, STP has revised the appropriate Emergency Operating Procedures (EOPs) accordingly. Specifically if a CS actuation occurs and all three CS pumps are in service, then the EOPs will allow one CS pump to be secured.

## 2. Has WOG COA A1b been rejected by STP? (WOG COA A1b is securing of more than one containment spray pump prior to recirculation).

### STP Response:

With less than two trains of CS, STP cannot ensure that doses to control room operators will remain less than General Design Criteria (GDC) 19 limits for the Design Basis Loss of Cooling Accident (LOCA) with the current licensed technology. Therefore, STP will not incorporate COA A1b.

# 3. In what way do STP EOPs "presently and adequately address refilling the RWST?" - upon loss of recirculation or only when sump clogging occurs? (WOG COA A5 – Refill of Refueling Water Storage Tank).

#### **STP Response:**

STP currently refills the RWST when the loss of recirculation capability occurs. In addition, STP has revised the "TRANSFER TO COLD LEG RECIRCULATION" procedure to commence refilling the RWST after verification of proper swap over to cold leg recirculation.

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# 4. In what way does STP address WOG COA A6 "Inject More than one RWST volume from a refilled RWST or by bypassing the RWST?"

## **STP Response:**

STP has the guidance to inject more than one RWST volume. The additional RWST total volume to be added will be coordinated with the Technical Support Center (TSC).