



South Texas Project Electric Generating Station PO Box 289 Wadsworth, Texas 77483

June 6, 2006
NOC-AE-06002018
10CFR50, Appendix A

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Unit 2
Docket No. STN 50-499
Unit 2 Control Room Inleakage Testing (TAC NO. MB9859)

- References:
1. Letter from Catherine Haney, NRC, to James J. Sheppard, STP Nuclear Operating Company, dated April 13, 2006 (ST-AE-NOC-06001485)
 2. Letter from T. J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758)

In Reference 1, the Nuclear Regulatory Commission (NRC) addressed the STP Nuclear Operating Company (STPNOC) response to NRC Generic Letter 2003-01, "Control Room Habitability," (Reference 2) regarding the performance of testing to confirm the most limiting unfiltered inleakage into the facility's control room envelopes (CRE). The NRC acknowledged the performance of integrated tracer gas testing conducted in South Texas Project (STP) Unit 1, and stated that Unit 2 has not been tested, to date. The NRC staff concluded that Unit 2 should be tracer gas tested to determine CRE inleakage. This letter discusses the type of testing performed to date in Unit 2 and STPNOC's plan to perform tracer gas testing in Unit 2.

STPNOC is a member of the Strategic Teaming and Resource Sharing (STARS¹) alliance and developed the Component Test Method (CTM) as an acceptable alternative to the Integrated Tracer Gas Test Method for pressurized, low-leakage CREs, which are characteristic of the STARS facilities. The CTM is considered capable of achieving greater measurement accuracy for low-leakage CREs when compared with the relatively large uncertainties associated with tracer gas testing.

Since 1999, STARS, in conjunction with the Nuclear Energy Institute (NEI) Control Room Habitability Task Force, has been closely interacting with the NRC staff to address issues

¹ STARS is an alliance of six plants (eleven nuclear units) operated by TXU Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

surrounding control room habitability. As a result, the CTM is endorsed in NEI 99-03, "Control Room Habitability Guidance," Revision 1, dated March 2003. In addition, the CTM is endorsed in NRC Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Plants," as an acceptable inleakage test method for subsequent testing following a baseline test, provided the results are correlated with tracer gas testing results in the same unit.

After comparing the test results between tracer gas testing and the CTM at different STARS facilities, STPNOC concluded that the CTM was demonstrated to be an acceptable stand-alone test for measuring control room inleakage. This position was expressed during a number of NRC Regional control room habitability workshops conducted during 2002. Nevertheless, NEI 99-03 requires that the CTM results must be correlated with tracer gas testing results for at least one unit for licensees to use the CTM for testing like unit(s).

In response to Generic Letter 2003-01, STPNOC performed the CTM in concert with integrated tracer gas testing in Unit 1. In Reference 2, STPNOC provided information that demonstrated favorable correlation between these two test methods in Unit 1. The CTM was then performed for Unit 2 to measure inleakage into the CRE. Since the CTM results for the two units were comparable, STPNOC concluded that the inleakage for each of the two units was essentially the same or nearly zero.

Because STPNOC has not gained NRC acceptance for the CTM as a baseline test, STPNOC plans to perform tracer gas testing in Unit 2 to determine inleakage into the CRE. In order to complete planning and budgeting for this test, this activity is expected to be completed in 2007.

A licensee commitment to perform tracer gas testing in Unit 2 is provided in the Attachment to this letter.

If you have any questions or require additional information, please contact Ken Taplett at (361) 972-8416 or me at (361) 972-7902.



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KJT/

Attachment: Licensee Commitment

cc:
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Licensee Commitment

The action in the following table is committed to by the STP Nuclear Operating Company. Any statements in this submittal with the exception of the action in the table below are provided for information purposes and are not considered commitments. Please direct questions regarding this commitment to Ken Taplett at (361) 972-8416.

Commitment	Due Date	Condition Report Action #
In response to NRC Generic Letter 2003-01, control room envelope inleakage will be determined for South Texas Project Unit 2 using tracer gas methods and the results will be reported to the Nuclear Regulatory Commission.	December 31, 2007	06-5549-2