



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

July 31, 2006  
NOC-AE-06002039  
10CFR20.1703(b)  
10CFR20.1705

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Revised Request for Use of Delta Protection Mururoa BLU  
Single-Use Suits (TAC NOS. MD-2313 and MD-2314)

Reference: Letter, John W. Crenshaw to NRC Document Control Desk, "Request for Use of Delta Protection Mururoa BLU Single-Use Suits", dated May 30, 2006 (NOC-AE-06002011)

Pursuant to the provision of 10 CFR 20.1703, "Use of Individual Respiratory Protection Equipment," and 10 CFR 20.1705, "Application for Use of Higher Assigned Protection Factors," STP Nuclear Operating Company (STPNOC) requests authorization to use the French-designed Delta Protection Mururoa BLU respiratory protection suits described in "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP). This request incorporates NRC comments on and supersedes the request referenced above.

STPNOC commits to use the Delta Protection Mururoa BLU self-fed single-use suits consistent with "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP) and to use the suits within the device configuration, limitations and conditions of use stated in the Safety Evaluation dated April 10, 2006 (TAC NO. MC8994).

The attachment to this letter lists STPNOC's commitments enabling use of the new system.

STPNOC requests approval of this request by September 1, 2006, to enable use of the Mururoa Model BLU suit during the fall 2006 refueling outage. Approval by September 1 will enable STPNOC to proceed with procedure changes and training necessary for use of the BLU suit.

STI 32024330

Aool  
11

If you have any questions regarding this submittal, please contact Mr. S. M. Head (361) 972-7136.

A handwritten signature in black ink, appearing to read 'TJ Jordan', written in a cursive style.

Thomas J. Jordan

Vice President, Assistant to CEO

TCK

Attachment: List of Commitments

cc:  
(paper copy)

Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011-8064

Richard A. Ratliff  
Bureau of Radiation Control  
Texas Department of State Health Services  
1100 West 49th Street  
Austin, TX 78756-3189

Senior Resident Inspector  
U. S. Nuclear Regulatory Commission  
P. O. Box 289, Mail Code: MN116  
Wadsworth, TX 77483

C. M. Canady  
City of Austin  
Electric Utility Department  
721 Barton Springs Road  
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire  
Morgan, Lewis & Bockius LLP

Mohan C. Thadani  
U. S. Nuclear Regulatory Commission

Steve Winn  
Christine Jacobs  
Eddy Daniels  
NRG South Texas LP

J. J. Nesrsta  
R. K. Temple  
E. Alarcon  
City Public Service

Jon C. Wood  
Cox Smith Matthews

C. Kirksey  
City of Austin

**LIST OF COMMITMENTS**

The following table identifies the actions necessary to fulfill the commitment made in this letter to use the Delta Protection Mururoa BLU self-fed single use suits consistent with "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP) and to use the suits within the device configuration, limitations and conditions of use stated in the Safety Evaluation, dated April 10, 2006 (TAC No. MC8994). Statements in this submittal with the exception of those in the table below are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Philip Walker at (361) 972-8392.

Commitment	Expected completion time	CR Action No
Establish procedures that implement the use of the BLU suits consistent with the Topical Report (ADAMS Accession No. ML053060280) and in accordance with the "configuration and conditions for use" identified in the NRC's related Safety Evaluation (ADAMS Accession No. ML060950499).	Prior to placing the suit in service.	CR 06-7098-1
Procedural guidance will be developed to ensure the BLU suits will be used in a configuration consisting of: Mururoa BLU one-piece encapsulating suit (of either PVC or Ethyfuge construction), fitted with a Micronel C500X-012EK-AB60 blower with a C501A-012AK-A battery (consistent with the parts list in Section 7 of Attachment 6.6.6 to the Topical Report (ADAMS Accession No. ML053060280) four Scott PF 10 P3, or four Delta Protection P3, high efficiency particulate filter cartridges. All four filter cartridges must be matching and replaced as a set.	Prior to placing the suit in service.	CR 06-7098-2
Procedures for use of the suit systems are integrated into the respiratory programs required by Subpart H of 10 CFR Part 20. Fit testing of user is not applicable to fully encapsulating suits. Prior to use, wearers are trained on these conditions of use as well as the emergency escape features of the suits.	Prior to placing the suit in service.	CR 06-7098-3
Procedural guidance will be developed to ensure suit enclosures are single use only, (other than those segregated for training purposes only) and are discarded after use. Unused suit enclosures are stored in their original manufacturer's packing (in an environment not colder than 32 deg. F, nor hotter than 140 deg. F), with a maximum storage shelf-life of 3 years. Suits are not to come in contact with anything colder than 41 deg. F, nor hotter than 140 deg. F, during use.	Prior to placing the suit in service.	CR 06-7098-4

Commitment	Expected completion time	CR Action No
Procedural guidance will be developed to ensure communication channels are established with Delta Protection to report any defects experienced with the device, and ensure that any manufacturer's notifications concerning the suit systems are received in a timely manner.	Prior to placing the suit in service.	CR 06-7098-5
Procedural guidance will be established to ensure an oxygen content of at least 19.5 percent by volume and prohibit the use of the suits in an Immediately Dangerous to Life and Health (IDLH) environment.	Prior to placing the suit in service.	CR 06-7098-6
Procedural guidance will be developed to ensure the suits are donned with a fully charged battery pack installed on the blower. The maximum period of use (timed from a fully charged battery), is 4 hours with the blower set at 600 l/min, and 7 hours with the blower at the 400 l/min setting.	Prior to placing the suit in service.	CR 06-7098-7
Procedural guidance will be developed to ensure the suits are used in accordance with recommendations in Attachments 6.6.4, 6.6.5, and 6.6.6 of the Topical Report (ADAMS Accession No. ML053060280)	Prior to placing the suit in service.	CR 06-7098-8