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

August 21, 2006
NOC-AE-06002049

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Commitment Change Summary Report

Attached is the South Texas Project (STP) Commitment Change Summary Report for the period July 14, 2005 through July 31, 2006. This report lists each commitment for which a change was made during the reporting period and provides the basis for each change.

The commitments were evaluated in accordance with the requirements of STP's Regulatory Commitment Change Process, which is consistent with the guidance in the Nuclear Energy Institute's "Guideline for Managing NRC Commitments", NEI 99-04. Additional documentation is available at STP for your review.

There are no new commitments in this letter.

If there are any questions, please contact Marilyn Kistler at 361-972-8385 or me at 361-972-7136.

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mkk

Attachment: Commitment Change Summary Report

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STI 32034837

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ATTACHMENT

Commitment Change Summary Report

Condition Report Number	Source Document	Source Date	Date of Change	Original Commitment Description	Revised Commitment Description	Justification for Change
04-3365-8	NOC-AE-04001758 (Response to Generic Letter 2003-01)	02/16/01	11/16/05 03/07/06 06/22/06	NOC-AE-04001758, 08/05/04 - Response To Request For Information On NRC Generic Letter 2003-01 - Control Room Habitability Revise the control room dose accident analyses to reflect the results of the control room inleakage testing. Due Date December 31, 2005	Alternative: Revise the control room dose accident analyses to reflect the results of the control room inleakage testing. Due Date December 15, 2006.	There are three commitment change evaluations for this action. Commitment evaluation one extends the original due date of December 31, 2005 to April 1, 2006, evaluation two extends due date April 1, 2006 to June 30, 2006, and extension three extends the due date June 30, 2006 to December 15, 2006. Evaluation 1 - During the course of performing the Loss Of Coolant Accident analysis using the Alternate Source Term (AST), it was determined that STP also needed to confirm the post accident sump pH. An integral part of this analysis was to determine the amount of electrical cable insulation in the containment building that contains chlorides. Also, additional iodine re-evolution analyses were required as a result of the sump pH analysis. These unforeseen extra analyses took several months that were not planned for when the commitment was made. Also, the multiple core redesigns during the 2RE11 outage took away Reactor Engineering resources necessary to support the required analyses. Industry experience on the success of AST submittals has been varied. Several such submittals have been rejected by the NRC. Based on the need to be very thorough in this submittal, additional time was needed to ensure a successful submittal. Evaluation 2 – The submittal must provide assurance that Chapter 15 analyses not performed with AST will meet the new AST dose limits when they are converted to the AST. This was planned to be done with simple scaling of radioisotope releases and atmospheric dispersion factors. This technique was successful with the Main Steam Line Break and the Steam Generator Tube Rupture accidents. However, since the Locked Reactor Coolant Pump Rotor and the Control Rod Ejection accidents also have postulated fuel failures, the ratioing technique was not successful. Reactor Engineering is performing explicit design calculations for these accidents to serve as bases for statements made in the submittal.

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						Additional time is needed to ensure a thorough submittal. Evaluation 3 – STP personnel attended an NRC workshop on their (NRC) experience with AST submittals and the contents of Regulatory Guide 1.183 on June 22, 2006. Also, a pre-submittal meeting with the NRC staff was scheduled for July 11, 2006. Four additional analyses are necessary to support the AST submittal. A draft submittal is expected on July 24. After site review, the submittal is planned to be presented to the September 2006 Plant Operations Review Committee meeting. Additional time was needed to ensure a thorough submittal.
04-12498-11	NOC-AE-06001968 - Supplement 2 to the Response to Generic Letter 2004-02 NOC-AE-05001922 - Supplement 1 to the Response to Generic Letter 2004-02	01/30/06 08/31/05	7/26/06	NOC-AE-06001968 -Supplement 2 to the Response to Generic Letter 2004-02 NOC-AE-05001922 - Supplement 1 to the Response to Generic Letter 2004-02 STPNOC will provide a supplemental response to Generic Letter 2004-02 upon completion of pending analyses and testing.	By letter from NRC to NEI dated 3/3/2006 and in a NRC letter to PWR licensees dated March 28, 2006, the following agreement was made regarding responses to GL 2004-02 and associated requests for additional information: "...for units completing their outage to incorporate strainer modification in 2006 or earlier, information needed to fully address GL 2004-02 will be provided to the NRC by December 31,2006. For units installing strainers after 2006, information needed to fully address GL 2004-02 will be provided to the NRC within 90 days of outage completion but not later than December 31, 2007. You may choose to use this alternative approach consistent with your strainer modification schedule, or you may choose to submit a	The original commitment to provide a status report was a voluntary commitment by STPNOC for the purpose of keeping the NRC informed of STP's progress with regard to resolution of the sump debris issues in GL 2004-02. It is not required for compliance or to adequately respond to the GL. The agreement made between NEI and NRC accommodates the known schedule issues and uncertainty with regard to resolution of sump design issues and establishes a mutually acceptable approach for licensees to provide the NRC with the plant-specific sump design information. In addition, STP's analyses depend on the completion of generic industry work which is not complete. The change was also discussed with Mohan Thadani, STP's NRC Project Manager, on July 26, 2006 STP has not completed its analysis and the agreement above provides a reasonable alternative to docketing a status report that will be of little or no value. Consequently, STP will provide the required information within 90 days of completing the Unit 2 Spring 2007 outage (i.e., about July 23, 2007).

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					response to the RAI letter's originally requested..."	
05-9845-1	ST-HL-AE-1060 - Response to Notice of Violation 83-22-02 ST-HL-AE-1110 - Material Control Program and User Test Program Clarifications ST-HL-AE-2480 - Response to NRC Compliance Bulletin 87-002: Fastener Testing to Determine Conformance With Applicable Material Specifications	2/21/84 7/30/84 1/29/88	12/20/05	**ST-HL-AE-1060** - Response to Notice of Violation 83-22-02 HL&P initiated a program to review previous and current material control practices and to develop additional controls that can be implemented effectively. This program drew upon work that had already been accomplished by a materials control task force formed to evaluate some of the recommendations made by the INPO audit of STP construction activities in the fall of 1983. This task force completed work and recommended a number of improvements in mid-January 1984. The following important improvements to STP material control will be undertaken. Item 1 * Reinstitute the transfer of heat code identifies on non-ASME safety-related high strength miscellaneous structural shapes and materials when this material is cut during site fabrication. (For ASME material this is already being done). Item 2 * Undertake user testing on non-ASME safety-related A36 bulk shapes and plate. Samples of each heat received from each vendor will be tested. This material will then be hard marked (stamped) to indicate that it is A36. The hard marks will be transferred during site fabrication activities. Item 3 * Undertake user testing for hardness and tensile strength on samples, by shipment, or bulk safety-related threaded fasteners.	User Testing and additional material marking requirements are not required for materials purchased through a vendor that is currently on the Approved Vendor List (or a new vendor added at a later date) provided the following conditions are met: 1) Purchase Order requires the vendor to furnish documentation (e.g., Certified Material Test Report) attesting to the material meeting the requirements of the applicable material specification; 2) Quality personnel review the supplied documentation and verify that the documentation indicates that the material does in fact meet the material specification requirements; 3) Material is marked by the vendor as required by the material specifications (e.g., ASTM A325).	The original commitments were made during construction in response to industry and site deficiencies. The commitments were considered to be necessary at the time in order to enhance a program that was in place and to put barriers in place during the construction phase when there were a multitude of suppliers and there was a substantial amount of material being purchased and received to support the construction effort. The commitments were further enhanced in response to an NRC Compliance Bulletin (87-002) that specifically addressed a concern related to fasteners. Part of the response by STPEGS committed the station to additional redundant material testing to further substantiate that the material being supplied did in fact meet the material specifications required by our Purchase Orders and that the vendors supplied documentation as to their compliance. The Operations Quality Assurance Plan (OQAP), in part, provides the requirements for evaluating and placing a vendor on the Approved Vendor List (AVL) and the requirements for that vendor to remain on the AVL. Measures for evaluating and selecting procurement sources are specified in procedures and include one or more of the following: 1) experience of users of identical or similar products of the prospective supplier, other utility or approved contractor audits/evaluations, audits/evaluations by cooperative utility groups, American Society of Mechanical Engineers Certificates of Authorization, STPEGS records accumulated in previous procurement actions, and STPEGS product operating experience; 2) evaluation of the supplier's current quality records supported by documented qualitative and quantitative information that can be objectively evaluated; 3) and source evaluation of the supplier's technical and quality capability as determined by a direct evaluation of facilities and personnel and quality program implementation.

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				These fasteners will be stamped to indicate grade (type) and class consistent with ASME III size restrictions. Item 4 * Undertake user testing for hardness and tensile strength on samples of safety-related anchor bolts by shipment. Anchor bolts will be stamped to indicate material type. Site fabrication of all anchor bolts (safety-related and non safety-related) has been discontinued. **ST-HL-AE-1110** - Material Control Program and User Test Program Clarifications Item 2 from ST-HL-AE-1060 Clarification/Change – In the event that A36 or A500 Grade B tube steel is not uniquely identifiable to an individual heat number, then testing will be performed on a periodic basis until the lot is depleted. The frequency of testing will be established on a case basis. Item 3 from ST-HL-AE-1060 Clarification/Change - The sentence in our letter which stated in part that threaded fasteners "will be stamped to indicated grade (type) and class" was meant to describe an existing condition and not a new commitment. Currently we purchase fasteners which are marked per ASTM requirements. Additional marking requirements imposed by our material control program to preclude commingling of safety and nonsafety class material include both hard marking and color coded zinc electroplating processes. In addition, for fasteners in inventory prior to May 21, 1984, the test sample will be defined by warehouse bin rather that by shipment as indicated in our letter. This is		Procurement source evaluations involve a review of technical and quality considerations to an extent considered appropriate. Technical considerations include the design or manufacturing capability and technical ability of suppliers to produce or provide the design, service, item or component. A documented quality assurance evaluation of a vendor's quality program is performed to assure it meets the appropriate requirements of 10CFR50 Appendix B, or where applicable, other nationally recognized codes and standards. Vendors may be placed on the AVL after passing this evaluation. Each vendor on the AVL is periodically evaluated and is removed if the evaluation is unacceptable. The OQAP also provides for the acceptance of procured material and services by review of written certifications and receipt inspection activities. These OQAP requirements are based on STPEGS commitments to Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), American National Standard N 18.7-1976/ANS-3.2, Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants, and American National Standards Institute N45.2.2-1972. There are no regulatory requirements to repeat vendor completed testing of material at the time of receipt. It should also be noted that the additional material testing is destructive testing and STPNOC therefore has to actually procure more material than is actually needed as the tested portion of the material is destroyed during the testing. These specification requirements should be deleted and discontinued. STPNOC also has requirements in specifications (e.g., 3A010SS0030) which require material marking to be applied to material. These additional 'marking' requirements (i.e., Cloverleaf stamp applied to A36 material and Arrowhead stamp applied to A500 tube steel) were part of an 'enhancement' to our program to provide additional traceability measures. The marking requirements are not required by the industry material specifications. The OQAP requires that material traceability is maintained either 1) on the item or 2) on records traceable to the item. Once material has progressed through the receiving

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				due to the fact that shipment identity is not maintained during storage. For future receipts, testing will be by shipment. Item 4 from ST-HL-AE-1060 Clarification/Change - We have modified our testing program to eliminate laboratory hardness testing of A36 and A193 anchor bolts. ASTM does not define any hardness limits for A36 and A193 material, and therefore hardness test results would not be meaningful. Tensile tests are required for this material under our program and are sufficient per ASTM to verify material type. In the event that long lead time anchor bolts do not exist in sufficient quantity to permit destructive testing per our program, we will undertake an alternate non-destructive testing program in the field to verify material type. This program will be fully documented by design specification and jobsite procedure. The program will employ the Equotip hardness tester correlated to known tensile strengths by material type and the Texas Nuclear Alloy Analyzer which is able to distinguish material types through spectographic analysis. **ST-HL-AE-2480** Response to NRC Compliance Bulletin 87-002: Fastener Testing to Determine Conformance With Applicable Material Specifications Response to Bulletin 87-02 describes details of STP's Users Test Program for bolting materials. These commitments revised and clarified the original commitment (Items 3,4) in ST-HL-AE-1060. Bulletin Action 1: Describe a) the characteristics currently examined during receipt inspection of fasteners (i.e., head markings for grade and manufacturer symbols, review of certified material test		process and located in a class bin, we have at least one of the OQAP methods to maintain traceability and in many cases, we have both. The additional 'marking' of certain materials does not provide additional traceability that justifies the manhours allotted to this activity. Material with only the Cloverleaf or the Arrowhead would not be sufficiently traceable for use. The specification requirements for this additional marking should be deleted and discontinued.

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				report or certificate of conformance), and b) internal controls utilized during storage and issuance from stock to assure the appropriate use of fasteners. Response to Bulletin Action 1: The response to Action 1 for bolting materials procured by Houston Lighting & Power Company (HL&P) and Bechtel Energy Corporation (BEC) for South Texas Project Electric Generating Station (STPEGS) is described in Attachment 2. Attachment 2 – ST-HL-AE-2480 Users Test Program In May 1984, the STPEGS implemented the Users Test Program, which requires testing samples of all safety related, 1/2 inch or greater in diameter, non-ASME bulk threaded fasteners, anchor bolts, and all-thread rod. The Users Test Program for threaded material is specifically prescribed for the bolts, nuts, studs, and threaded rods furnished by the construction manager (BEC) to the constructor (Ebasco Constructors, Inc.) and/or contractors for use in field-assembled connections. The threaded fasteners for shop-assembled connections furnished (tightened or loose) by equipment manufacturers or component fabricators are not subject to the STP Users Test Program. The control of that threaded fastener material is covered under the supplier's Quality Assurance Program (QAP). The STP contractor for HVAC ductwork typically does not furnish the threaded fasteners for field-assembled connections. The only threaded fasteners furnished by this contractor are restricted to closure panels and other limited applications, and all those fasteners are procured under the contractor's QAP.		

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				Items procured to the material specifications listed below, require "User Testing" prior to being issued for field installation: A. Threaded fasteners conforming to: ASTM A307, GR A ASTM A325, Type I ASTM A490, Type I ASTM A449 ASTM A1 94 ASTM A563 ASTM A193 The "Users Test" program requires tests of tensile properties, hardness (if specified), and chemical analysis per the applicable ASTM standard for these threaded fasteners. B. Anchor bolts conforming to: ASTM A36 ASTM A193 Tests of tensile properties, hardness (if specified) and chemical properties are required tests in the "User Test" program for anchor bolts. C. Threaded rod conforming to: ASTM A36 ASTM A108 ASTM A193 Tests to determine the tensile and chemical properties are required in the "Users Test" program. ASTM A108 and galvanized all-thread rod which are purchased as catalog items are tested in the "Users Test" program to ensure adequate tensile strength and chemical properties.		

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				The sample size of threaded fasteners and anchor bolts tested is defined in the "shipping lot method" of ASTM A325. NOTE: For the initial testing of materials in the warehouse on May 21, 1984, at least one fastener from each location was tested, or the "shipping lot method" of ASTM A325 was utilized, whichever was greater. The sample size of all-thread rod tested is as follows: 1. Threaded rod supplied by prequalified manufacturers with traceable heat numbers: One test per year or one test per five (5) heat numbers purchased for each manufacturer whichever is greater. 2. Rod furnished by companies other than the above, with traceable heat numbers: One test per heat number. 3. Rod not traceable to manufacturer heat numbers: One test for first 250 linear feet and one test for each subsequent 1000 linear feet. D. Fastener materials requiring User Testing are segregated and Hold Tagged. The User Test Program coordinator assigns test numbers, maintains logs and records for accountability, selects test samples and tracks all tests until Quality Control accepts the test results. Fasteners that do not conform to test requirements are reported in accordance with approved site procedures. Threaded fasteners are subject to tension testing of full size specimens furnished with the corresponding nuts in accordance with ASTM A370, subsection S11.1.4 or S11.1.5. This test is for the purpose of verifying the bolt, rod, or stud material and threads, and may be used in lieu of the proof-load tests prescribed for bolts by the ASTM specifications.		

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				Anchor bolts which are of a unique type or limited quantity, designated for a specific application, and having no surplus available for destructive testing, are non-destructively tested onsite to confirm material type. Section IV - HL&P Receipt Inspection Program D. Performance of additional HL&P specified inspections or tests as required by the purchase order for the material or other documents.		