



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

May 17, 2007
NOC-AE-07002152
10CFR50.36
10CFR50.90

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
Supplement to Revised Broad Scope
Risk-Informed Technical Specification Amendment Request

Reference: Letter from David W. Rencurrel to NRC Document Control Desk dated December 28, 2006, "Revised Broad Scope Risk-Informed Technical Specification Amendment Request" (ML070040247, NOC-AE-06002036 TAC Nos. MD 2341 & MD 2342)

In the referenced correspondence, the STP Nuclear Operating Company (STPNOC) submitted a revised license amendment request for a broad scope risk-informed set of Technical Specification (TS) changes. This supplement to the license amendment request revises the license amendment request described in that application to clarify the description of the Configuration Risk Management Program in TS 6.8.3.k in response to NRC comments.

The revision to TS 6.8.3.k is an administrative clarification and does not change the requirements or application of the proposed changes to the STP TS. The Safety Evaluation and Determination of No Significant Hazards previously submitted are not affected. The revised markup to TS 6.8.3.k is attached. The other proposed TS changes previously submitted are not affected.

There are no commitments in this letter.

The proposed amendment will not have an adverse impact on the health and safety of the public.

The STP Plant Operations Review Committee has reviewed and concurred with the proposed changes.

In accordance with 10 CFR 50.91(b), the South Texas Project is providing the State of Texas with a copy of this proposed amendment.


Attachment 1 responds to NRC comments on the STP application.

Attachment 2 is the markup of the affected TS.

If you have any questions, please call Wayne Harrison at 361-972-7298 or me at 361-972-7454.

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

Executed on May 17, 2007.
Date


C. T. Bowman
General Manager, Oversight

Attachments:

1. Response to NRC Request for Additional Information
2. Technical Specification Mark-up Page

cc:
(paper copy)

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**Response to NRC
Request for Additional Information**

Attachment 1

Response to Request for Additional Information

1. The revised 6.8.3.k for the Configuration Risk Management Program (CRMP) identifies changes in core damage frequency (CDF), large early release frequency (LERF), or cumulative core damage probability. In fact, NEI 06-09 assesses risk-informed completion times (RICTs) based on cumulative core damage probability (CDP) and cumulative large early release probability (LERP). Similarly, the TS bases identifies only the incremental core damage probability (ICDP) limit explicitly. The TS and bases need to correctly refer to the appropriate risk metrics used in NEI 06-09.

In addition, the staff believes the 30-day backstop should be referenced in TS 6.8.3.k.

Response: See the attached revised markup to TS 6.8.3.k. The revised Bases description was provided in a separate submittal dated May 9, 2007 (NOC-AE-07002163) in response to an NRC request for additional information. As noted in the cover letter, the changes to TS 6.8.3.k are administrative and do not affect the requirements or application of the TS. The safety evaluations and determinations of No Significant Hazards previously submitted are not affected.

Technical Specification Mark-Up Pages

Attachment 2

6.0 ADMINISTRATIVE CONTROLS
6.8 Procedures, Programs, and Manuals

6.8.3.j (continued)

Peak calculated containment internal pressure for the design basis loss of coolant accident (LOCA), P_a is 41.2 psig.

The maximum allowable containment leakage rate, L_a , is 0.3 percent of containment air weight per day.

Leakage rate acceptance criteria are:

- 1) Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit start-up following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ as-left and $\leq 1.0 L_a$ as-found for Type A tests.
- 2) Air lock testing acceptance criteria for the overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.

The provisions of Surveillance Requirement 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Surveillance Requirement 4.0.3 apply to the Containment Leakage Rate Testing Program.

k. Configuration Risk Management Program (CRMP)

~~A program to assess changes in core damage frequency and cumulative core damage probability resulting from applicable plant configurations. The program should include the following:~~ **A program to calculate risk-informed completion time in accordance with NEI 06-09, "Risk-Managed Technical Specifications (RMTS) Guidelines, Rev. 0". The CRMP may be used for calculating a risk-informed completion time only in Mode 1 and Mode 2. In accordance with NEI 06-09, the completion time determined using the CRMP shall not be more than 30 days.**

- ~~1) Training of personnel~~
- ~~2) procedures for identifying the generation of risk profiles and the evaluation of risk against established thresholds, and~~
- ~~3) provisions for evaluating changes in risk resulting from unplanned maintenance activities;~~

(continued)