

From: Mohan Thadani
To: Internet:smhead@stpegs.com
Date: 10/30/2007 3:53:32 PM
Subject: GL 2007-01:PRELIMINARY REQUEST FOR ADDITIONAL INFORMATION

Scott:

The NRC staff has reviewed the licensees responses to GL2007-01 and has determined that the following additional information from STPNOC is necessary to clarify the information that was provided in their response. I request that STPNOC review the following request for additional information and discuss the information requested during a telephone call with the MRC staff. During the call please indicate your schedule for providing responses to questions outlined below. I will document this email by regular mail.

Thanks.

Mohan
X1476

PRELIMINARY REQUEST FOR ADDITIONAL
INFORMATION REGARDING RESPONSE TO
GL 2007-01, "Inaccessible or Underground Power
Cable Failures that Disable Accident Mitigation
Systems or cause transients." TAC NOS.
MD4382 and MD4383.

A. The U.S. Nuclear Regulatory Commission (NRC) staff has received the cable failure history for South Texas Project (STP) in response to Generic Letter (GL) 2007 01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients." During its review, the licensee found no failures of power cables within the scope of Title 10 of the Code of Federal Regulations (10 CFR), Section 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (Maintenance Rule (MR)). Please confirm that this history includes cable failures that occurred prior to July 10, 1996.

Each licensee must implement the regulations in the MR no later than July 10, 1996, in accordance with 10 CFR 50.65(c). Although some licensees have interpreted the MR to not require inclusion of events prior to 1996, the regulations in 10 CFR 50.65(a) (1) mandate that licensees consider previous failures, including events prior to 1996. If STPNOC's response to GL 2007-01 excluded cable failures that occurred prior to July 10, 1996, provide the data for these failures as requested in GL 2007-01.

B. The licensee stated that STPNOC has no specific program for monitoring the condition of underground cables. However, STPNOC has proactively replaced and continues to replace cables based on low Megger readings recorded during motor and load center maintenance activities, prior to cable grounds developing into significant operational challenges. If STPNOC's response excluded cable replacements for cables that were within the scope of the GL, provide the data

for each cable as requested in GL 2007-01.

The NRC provided additional guidance on how licensees should determine which cable failures are within the scope of GL 2007 01 in the NRC letter dated April 13, 2007, from Michael J. Case (NRC) to James H. Riley (Nuclear Energy Institute) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML070940311).

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