

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

December 10, 2007
NOC-AE-07002237
10CFR50.54(f)

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Request for Extension for Final Response to Generic Letter 2004-02
and Implementation of Revised Design Basis for ECCS Sump
(TAC Nos. MC4719 and MC4720)

- References:
1. NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," dated September 13, 2004 (ML042360586)
 2. Letter, T. J. Jordan, STPNOC, to Document Control Desk, "90-Day Response to Generic Letter 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors," dated March 8, 2005 (NOC-AE-05001862, ML050770105)
 3. Letter, T. J. Jordan, STPNOC, to Document Control Desk, "Supplement 1 to the Response to Generic Letter 2004-02," dated August 31, 2005 (NOC-AE-05001922, ML052500311)
 4. Letter, William H. Ruland, NRC, to Anthony R. Pietrangelo, NEI, "Plant-Specific Requests for Extension of Time to Complete One or More Corrective Actions for Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," dated November 8, 2007 (ML073060581)

In accordance with the guidance of Reference 4 for Case 2 plants, STP Nuclear Operating Company (STPNOC) requests an extension of the completion date for final review and approval activities needed to fully implement NRC Generic Letter (GL) 2004-02 corrective actions at STP Units 1 and 2 to June 30, 2008. Additional time is required to complete and document testing and to implement requirements of the STPNOC Quality Assurance Program, specifically 10 CFR 50, Appendix B activities related to design control, document control, control of purchased services and quality assurance records.

Reference 1, NRC GL 2004-02, requested that licensees take actions and provide information regarding the potential impact of debris blockage on emergency recirculation during design basis accidents. In References 2 and 3, STPNOC provided its response to GL 2004-02 stating that STPNOC will be in full compliance with the regulatory requirements discussed in the applicable regulatory requirements section of GL 2004-02 by December 31, 2007.

Plant hardware modifications developed in response to issues identified in GL 2004-02 are installed in STP Units 1 and 2 and are supporting compliance with the regulatory requirements for long term cooling following a design basis loss of coolant accident. Similarly, implementation is complete for STPNOC

plant administrative procedures and processes needed to support the GL 2004-02 hardware modifications and to support the current assumptions, initial conditions and conclusions of GL 2004-02 related evaluations, including the current evaluations of design basis accident debris generation and transport, sump strainer performance, impact of chemical effects and downstream effects of debris.

Substantial plant-specific testing that supports assumptions and corresponding conclusions contained in the GL 2004-02 evaluations for STP has been performed. However, additional strainer head loss testing for chemical effects is scheduled to be completed in February 2008. In addition to the completion of the testing, there are additional actions required prior to the vendor completing a final test report that meets the requirements of the procurement specifications, including those of 10 CFR 50, Appendix B for control of purchased services and procurement document control. The test report is currently scheduled to be available in May 2008. Following receipt of the final test report from the vendor, additional actions are also required by STPNOC to complete formal verification of design inputs, assumptions and conclusions of STPNOC calculations and evaluations conducted in response to issues identified in GL 2004-02, including possible revision of the downstream effects analyses. These activities also include compliance with 10 CFR 50, Appendix B requirements for design control, document control and quality assurance records.

Based on the extensive experience gained while conducting and assessing actions taken in response to issues identified in GL 2004-02 and the margin in the sump design, STPNOC believes that the testing results, when fully documented in the test report, will fully support all corrective actions taken in response to issues identified in GL 2004-02.

Since hardware, procedures and administrative controls required to support actions taken in response to issues identified in GL 2004-02 are already implemented at STP, STPNOC has reasonable assurance that if an accident of the type described in GL 2004-02 were to occur at STP, plant systems and plant operators would respond in a manner consistent with the intent of the GL 2004-02 corrective actions, including conformance with the regulatory requirements listed in GL 2004-02. However, the plant design and licensing basis can not be changed until all regulatory requirements affecting associated change processes are complete.

Based on the evaluation above, STPNOC has determined that STP meets the criteria for a Case 2 plant described in Reference 4 as a plant that has determined that testing and/or analyses will not be completed or are not likely to be completed by the end of 2007. The guidance directs the licensees to apply the criteria of SECY-06-0078 for the basis for the extension request. STPNOC has concluded the criteria of the SECY are met:

- Criterion 1 for a plan with a milestone schedule is satisfied as discussed above.
- Criterion 2 for mitigative measures is satisfied since hardware, procedures and administrative controls required to support actions taken in response to issues identified in GL 2004-02 are already implemented at STP.

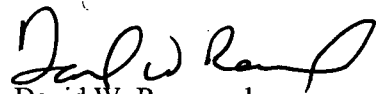
Therefore, STPNOC requests an extension to June 30, 2008 to allow full completion of 10 CFR 50, Appendix B activities to support changing the plant design and licensing bases to be in compliance with actions taken in response to issues identified in GL 2004-02.

Following completion of the testing and 10 CFR 50, Appendix B activities described above and the associated changes to the STP licensing basis, STPNOC will submit a letter by June 30, 2008, verifying completion of all GL 2004-02 corrective actions and confirming compliance with the regulatory requirements listed in GL 2004-02.

Attachment 1 documents the commitment made to the NRC by this letter. STPNOC requests approval of the proposed extension by December 31, 2007. If you have any questions concerning this matter, please contact Mr. A. W. Harrison at (361) 972-7298, or me at (361) 972-7867.

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

Executed on 12/10/07.



David W. Rencurrel
Vice President,
Engineering & Strategic Projects

Awh/

Attachment 1: Commitment

cc:

(paper copy)

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

Mohan C. Thadani
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (MS 7 D1)
11555 Rockville Pike
Rockville, MD 20852

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

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

(electronic copy)

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

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

Thad Hill
Eddy Daniels
Marty Ryan
Harry Holloway
Steve Winn
NRG South Texas LP

Ed Alarcon
J. J. Nesrsta
R. K. Temple
Kevin Pollo
City Public Service

Jon C. Wood
Cox Smith Matthews

C. Kirksey
City of Austin

Commitment

The following table identifies the action committed to by the STP Nuclear Operating Company in this document. Any 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 Scott Head at (361) 972-7136.

Commitment	Due Date	Condition Report
Following completion of the 10 CFR 50, Appendix B activities described above and the associated changes to the STP licensing basis, STPNOC will submit a letter verifying completion of all GL 2004-02 corrective actions and confirming compliance with the regulatory requirements listed in GL 2004-02.	06/30/2008	04-12498-15