



South Texas Project Electric Generating Station 4000 Avenue F - Suite A Bay City, Texas 77414

February 12, 2008
ABR-AE-08000021

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

South Texas Project
Units 3 and 4
Docket No. 52-012 and 52-013
Changes to NRC Commitments

- References:
1. Letter, M. A. McBurnett to Document Control Desk, "Combined License Application," dated September 20, 2007 (ABR-AE-07000004)
 2. Letter, G. T. Gibson to W. F. Burton, "Environmental Report Acceptance Review: Outstanding Issues," dated November 8, 2007 (ABR-AE-07000010)
 3. Letter, M.A. McBurnett to Document Control Desk, "Resolution of Docketing Issues," dated December 20, 2007 (ABR-AE-07000014)

In Reference 1, STP Nuclear Operating Company (STPNOC) committed to have the PRA model maintenance and updated procedures in place prior to operations. This commitment should have been scheduled to be in place prior to construction. The attachment to this letter restates and reschedules this commitment.

In References 1, 2, and 3 STPNOC made commitments to complete numerous actions in support of the Combined License Application. Because of limited resources now available to STPNOC to complete the work required, it has become necessary for STPNOC to extend the due dates for some of these commitments while we obtain the necessary vendor support. The attachment to this letter restates and reschedules these commitments.

If there are questions regarding this response, please contact Bill Mookhoek at (361) 972-7274 or myself at (361) 972-4626.

G. T. Gibson
Manager, Regulatory Affairs

wem
Attachment: Rescheduled Commitment List

D079
MRO

cc: w/o attachment except *

(paper copy)

Director, Office of New Reactors
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

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

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

*Steven P. Frantz, Esquire
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave. NW
Washington, DC 20004

*George F. Wunder
Two White Flint North
11455 Rockville Pike Mail Stop 7 F31
Rockville, MD 20852-2738

(electronic copy)

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

Loren R. Plisco
U. S. Nuclear Regulatory Commission

Thad Hill
Marty Ryan
Robert Bailey
Steve Winn
Eddy Daniels
NRG South Texas 3/4 LLC

Jon C. Wood, Esquire
Cox Smith Matthews

C. Kirksey
City of Austin

J. J. Nesrsta
R. K. Temple
Kevin Pollo
L. D. Blaylock
CPS Energy

Attachment

Rescheduled Commitment List

The following table identifies rescheduled actions committed to by STP Nuclear Operating Company in earlier letters. Any other statements in this letter are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Original Due Date	Rescheduled Due Date
ABR-AE-07000004 COM 19.4S-3 PRA model maintenance and update procedures are in place.	Prior to Operations	Prior to Construction
ABR-AE-07000004 COM 2.5S-1 Resonant Column Torsional Testing results will be added to the FSAR	3rd Quarter of 2008	12/15/08
ABR-AE-07000004 COM 3H-2 Final seismic analysis of site-specific Category I structures to be updated in the FSAR	3rd Quarter of 2008	3/1/09
ABR-AE-07000010 commitment #2 Revise ER sections on Cultural Resources for COLA Rev.1	COLA Rev. 1	COLA Rev. 2
ABR-AE-07000010 commitment # 3 Develop procedure for cultural or historical artifact discovery during construction	4/30/08	7/30/08
ABR-AE-07000010 commitment # 7 Revise ER sections on terrestrial ecology to describe "important species" in a consistent manner	COLA Rev. 1	COLA Rev. 2
ABR-AE-07000014 commitment # 3 STPNOC will modify the proposed change to the Radwaste Building seismic design to indicate that the change constitutes a Tier 1 departure and will modify the COLA appropriately in Revision 1, including requesting an exemption from Tier 1.	2/15/08	COLA Rev. 2
ABR-AE-07000014 commitment # 5 The reference cited, "The Current State of Knowledge Regarding Potential Tsunami Sources Affecting U.S. Atlantic and Gulf Coasts," was not available prior to the submittal of the STP Units 3 & 4 COLA. The information in this reference will be reviewed and FSAR Subsection 2.4S.6 will be updated if required.	2/15/08	COLA Rev. 2

Commitment	Original Due Date	Rescheduled Due Date
<p>ABR-AE-07000014 commitment # 7</p> <p>The number of observation wells (28) used to develop groundwater level contour maps and to predict pathways will be evaluated and FSAR Subsection 2.4S.12 modified as required. STPNOC will develop a detailed schedule for this activity by February 15, 2008.</p>	2/15/08	7/30/08
<p>ABR-AE-07000014 commitment # 10</p> <p>Additional subsurface explorations for the Unit 4 Radwaste Building, the rerouted service water pipe tunnels, and one additional boring within the footprint for each UHS pump house were performed in mid-2007. The test results are currently under review and will be transmitted by February 15, 2008.</p>	2/15/08	7/30/08
<p>ABR-AE-07000014 commitment # 2</p> <p>The overall project schedules are still being developed and the schedule for the DAC items cannot be immediately provided. STPNOC commits to provide the requested plans and schedules to the NRC by early 2008.</p>	3/31/08	7/30/08
<p>ABR-AE-07000014 commitment # 6</p> <p>The assumption used in FSAR Subsection 2.4S.12 for the postulated Upper Shallow Aquifer pathway concerning discharge to Kelly Pond will be validated using specific hydrogeologic data by March 31, 2008.</p>	3/31/08	12/15/08
<p>ABR-AE-07000014 commitment # 8</p> <p>The plotted contour maps provided in FSAR Subsection 2.4S.12 will be evaluated and updated as required considering construction of the proposed units and that plant structures and footings could penetrate the Lower Shallow Aquifer. This effort will be completed by March 31, 2008.</p>	3/31/08	10/30/08