

March 20, 2008

Mr. James J. Sheppard  
President and Chief Executive Officer  
STP Nuclear Operating Company  
South Texas Project Electric  
Generating Station  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION RE: RESPONSE TO GENERIC LETTER 2007-01, "INACCESSIBLE OR UNDERGROUND POWER CABLE FAILURES THAT DISABLE ACCIDENT MITIGATION SYSTEMS OR CAUSE PLANT TRANSIENTS" (TAC NOS. MD4382 AND MD4383)

Dear Mr. Sheppard:

The U.S. Nuclear Regulatory Commission (NRC) staff has received from STP Nuclear Operating Company (STPNOC, the licensee) the cable failure history for South Texas Project Electric Generating Station, Units 1 and 2 (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, you 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, please provide the data for these failures as requested in GL 2007-01.

You 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, please 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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Please provide a response to this request for additional information within 30 days of the date of this letter. If you have any questions regarding this matter, please contact me at (301) 415-1476 or email [mct@nrc.gov](mailto:mct@nrc.gov).

Sincerely,

*/ra/*

Mohan C. Thadani, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

cc w/encl: See next page

Please provide a response to this request for additional information within 30 days of the date of this letter. If you have any questions regarding this matter, please contact me at (301) 415-1476 or email [mct@nrc.gov](mailto:mct@nrc.gov).

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\*email

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	EEEE/BC	NRR/LPL4/BC
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DATE	3/19/08	3/18/08	10/30/07	3/20/08

**OFFICIAL RECORD COPY**

South Texas Project, Units 1 and 2

12/5/2007

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South Texas Project, Units 1 and 2

12/5/2007

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