

April 16, 2008

Mr. Gregory Gibson, Manager  
Regulatory Affairs  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 08 RELATED TO  
THE SRP SECTION 17.5 FOR THE SOUTH TEXAS COMBINED LICENSE  
APPLICATION

Dear Mr. Gibson:

By letter dated September 20, 2007, STP Nuclear Operating Company (STPNOC) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U. S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter. These questions were discussed with Mr. Bill Stillwell and other members of your staff on April 16, 2008.

To support the review schedule, you are requested to respond within 45 days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

Mr. Gregory Gibson

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If you have any questions or comments concerning this matter, I can be reached at 301-415-1494 or by e-mail at [george.wunder@nrc.gov](mailto:george.wunder@nrc.gov).

Sincerely,

**/RA/**

George F. Wunder, Senior Project Manager  
ESBWR/ABWR Projects Branch 2  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-012  
52-013

eRAI Tracking No. 65

Enclosure:  
Request for Additional Information

cc: William Mookhoek

Mr. Gregory Gibson

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If you have any questions or comments concerning this matter, I can be reached at 301-415-1494 or by e-mail at [george.wunder@nrc.gov](mailto:george.wunder@nrc.gov).

Sincerely,

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Request for Additional Information

cc: William Mookhoek

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\*Approval captured electronically in the electronic RAI system.

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Request for Additional Information  
South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013

SRP Section: 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit  
and New License Applicants

Application Section: 17.5S STP 3 & 4 Quality Assurance Program Description

## QUESTIONS

### 17.5-1

Section A, "Organization," of Standard Review Plan (SRP) Section 17.5 indicates that the applicant's Quality Assurance Program Description (QAPD) should contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the Quality Assurance (QA) program. The Nuclear Energy Institute (NEI) template provides flowcharts (Figures II.1-1 and II.1-2) to delineate the organizational interfaces. Please provide a clear illustration of the interrelationships between STP corporate and the QA organization.

### 17.5-2

Subpart C of 10 CFR Part 52 identifies the general provisions for combined licenses. More specifically, 10 CFR Part 52.79 identifies the technical information required to be contained in the final safety analysis report. Section 2.5 of STP's QAPD states that, "10 CFR 50.34(b)(6)(ii) and 10 CFR Part 52.59(a)(25) requires that the Final Safety Analysis Report(FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied." In this statement, STP references 10 CFR 52.59, instead of 10 CFR 52.79. The application also references 10 CFR 50.34, which no longer will be required. Please justify or amend these departures.

### 17.5-3

Appendix B to 10 CFR Part 50 requires the applicant to establish a quality assurance program that provides for the indoctrination and training of personnel performing activities affecting quality. In Section 2.8 of its QAPD, STP commits to compliance with American Society of Mechanical Engineers (ASME) NQA-1-1994 Basic Requirement 2 and Supplements 2S-1, 2S-2, 2S-3, and 2S-4, with certain exceptions to Supplements 2S-2 and 2S-3, in establishing qualification and training programs. The NEI template identifies exceptions to Supplements 2S-1, 2S-2, and 2S-3. However, STP did not include the exception to Supplement 2S-1 for the qualifications of personnel performing independent quality verification activities, inspection planning, and the evaluation of the capabilities of inspectors or the training program for inspectors. Please verify that STP will not be implementing this exception.

### 17.5-4

Section U, "Regulatory Commitments," of SRP Section 17.5 indicates that the applicant should commit to the most recent revision of certain Regulatory Guides (RGs) and Generic Letters (GLs). Regulatory Guide 1.37, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants," is included on this list and is referenced in Section 13.2 of STP's QAPD. However, Part IV, "Regulatory Commitments," of the STP QAPD does not identify RG 1.37 as a commitment. Please justify this exception.

17.5-5

SRP Section 17.5(V), "Nonsafety-Related SSC Quality Controls," indicates that inspections of nonsafety-related SSCs should be performed where necessary to verify conformance of an item or activity to specified requirements or to verify that activities are satisfactorily accomplished. STP QAPD Part III Section 1.10, "Inspection," states that "These inspections may be performed by personnel in the line organization through the process that utilizes knowledgeable personnel to perform the verification function." Please identify and provide an explanation of the process that utilizes knowledgeable personnel to perform the verification function within STP's organization.

17.5-6

The SRP, which indicates that the applicant's organizational description should address functional responsibilities, identifies these responsibilities to include activities such as preparing, reviewing, approving, and verifying designs; qualifying suppliers; preparing, reviewing, approving, and issuing instructions, procedures, schedules, and procurement documents; purchasing; verifying supplier activities; identifying and controlling acceptable and nonconforming hardware and software; manufacturing; calibrating and controlling measuring and test equipment; qualifying and controlling special processes; constructing; inspecting; testing; startup; operating; performing maintenance; performing the audit function; and controlling records. The NEI template identifies the overall organization as well as the individual positions that are responsible for performing and verifying these specific activities. (1) Please address in more detail the functional responsibilities. For example, for the Plant General Manager responsible for the operations and maintenance of the plant, the description does not specify the functions related to operations (e.g., startup, testing, surveillance, engineering), and how these functions will be performed. (2) Please refer to the specific organizational titles throughout the QAPD.

17.5-7

STP QAPD Section 13.2, "NQA-1-1994 Commitment/Exception," includes the reference to RG 1.37 in the text of a sub-bullet labeled "Subpart 3.2, Appendix 2.1." This sub-bullet is placed under the bullet "NQA-1-1994, Subpart 2.2." The applicant should add a bullet labeled "NQA-1-1994, Subpart 3.2" above this sub-bullet for proper organization of the exceptions.