



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

April 29, 2008
NOC-AE-08002292
10CFR50.90

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Request for Additional Information on
Proposed Revision to Technical Specifications Regarding Control Room
Envelope Habitability in Accordance with TSTF-448, Revision 3,
Using the Consolidated Line Item Improvement Process
(TAC Nos. MD5942 AND MD5943)

Reference: Letter from Charles T. Bowman to NRC Document Control Desk dated June 26, 2007, "Proposed Revision to Technical Specifications Regarding Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process" (NOC-AE-07002165)

In the referenced letter, the STP Nuclear Operating Company (STPNOC) submitted a license amendment request to revise Technical Specifications by incorporating TSTF-448 for control room envelope habitability. This submittal responds to NRC questions regarding this request issued on March 19, 2008.

There are no new commitments in this submittal.

If you have any questions, please call Ted Koser at 361-972-8963 or me at 361-972-7454.

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

Executed on April 29, 2008
Date


Charles T. Bowman
General Manager, Oversight

tck/

Attachment: STPNOC Response to Request for Additional Information

STI: 32299110

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NLR

cc:

(paper copy)

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

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

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

(electronic copy)

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

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

Thad Hill
Eddy Daniels
Catherine Callaway
Brad Porlier
Staney Rostad
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

STPNOC RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**South Texas Project Units 1 and 2
Response to Request for Additional Information on
Proposed Revision to Technical Specifications Regarding Control Room
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NRC RAI

The Nuclear Regulatory Commission (NRC) staff has reviewed the STP Nuclear Operating Company (STPNOC) request dated June 26, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML071870252), for approval of an amendment to the South Texas Project, Units 1 and 2, technical specifications (TS) related to control room envelope habitability, in accordance with TS Task Force (TSTF) Traveler TSTF-448, Revision 3. The staff has determined that additional information is necessary to complete its review of the request. Please provide a response which addresses the following request for additional information questions from the Containment and Ventilation Branch.

NRC RAI 1

In Section 2.2, page 1 of 5 of Attachment 1 to your letter dated June 26, 2007 (NOC-AE-07002165), it is stated that "STPNOC proposes to reference NEI [Nuclear Energy Institute] 99-03, Revision 0, dated June 2001, in the TS basis for TS 3.7.7, instead of Revision 1, dated March 2003 because the NRC has not formally endorsed Revision 1." The staff understands this to mean that because the NRC has not endorsed Revision 1, STPNOC will not reference this document at any point. However, in Section 6.8.3.p.3, page 3 of 5 of Attachment 2, you identified under item 1) a general exception to Section C of Regulatory Guide (RG) 1.197, Revision 0, by stating that "Section 4.3.2 "Periodic CRH [Control Room Habitability] Assessment" from NEI 99-03 Revision 1 will be used as input to a site specific Self Assessment procedure." Please clarify this inconsistency, keeping in mind that the NRC has neither formally endorsed NEI 99-03, Revision 1 nor has it reviewed this document.

STP Response

To correct this inconsistency, STPNOC plans to withdraw the requested general exception to section C of Regulatory Guide (RG) 1.197, Revision 0, identified as item 1 in Section 6.8.3.p.3.

No other changes are being proposed to the submittal by this letter.

NRC RAI 2

In Section 2.2, page 2 of 5 (second paragraph) of Attachment 2, it is stated that “[n]o inleakage test is required to determine unfiltered in-leakage from hazardous chemical since this would be a value much less than that currently assumed in the hazardous chemical analyses.” Note that NRC RG 1.197 refers to RG 1.78 for guidance on meeting a hazardous chemical challenge. In general, the staff finds it acceptable for licensees to commit to the guidance of RG 1.78 to address hazardous chemical challenges. In the discussion you provided to address chemical hazardous challenges, it is not clear that you are in agreement with the staff position on this issue. Please provide a discussion indicating that your position is consistent with the staff position as outlined in RG 1.78, or provide justification for the differences.

STP Response

Technical Specification Amendments 76 and 65, dated July 6, 1995, relocated TS 3/4.3.3.7, Chemical Detection Systems, to the Technical Requirements Manual. A subsequent design change evaluation allowed removal of the Toxic Gas monitors.

As the following excerpt from South Texas Project UFSAR section 6.4.4.2, “Toxic Gas Protection”, indicates, STPNOC’s position is in compliance with RG 1.78.

The habitability of the control room was evaluated using the procedures described in Regulatory Guide 1.78. As indicated in Section 2.2, no offsite storage or transport of chemicals is considered a hazard to the plant based on the Offsite Toxic Gas Analysis (Ref. 2.2-3). There are no onsite chemicals that pose a credible hazard based on the Onsite Toxic Gas Analysis (Ref. 2.2-3). Therefore, special provisions for protection against toxic gases are not required. In accordance with the plant emergency plans and procedures, self-contained breathing apparatus is provided for assurance of control room habitability.

Toxic gases which are handled onsite are kept to a minimum. During normal operation small amounts of chlorine are handled within the site boundary at the Training facility. The amount of chlorine (<300 lbs) will not impact the control room envelope. A detailed evaluation of potential hazardous chemical accidents and their impact on control room habitability is provided in Section 2.2.3.

Reference 2.2-3 in the UFSAR lists Offsite Toxic Gas Analysis, NC 9006
Onsite Toxic Gas Analysis, NC 9015

Because there is no credible threat of hazardous chemical challenge, as defined by the procedures described in RG 1.78, testing for hazardous chemical in-leakage at STP is not required.