



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

May 12, 2008
NOC-AE-08002284
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
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South Texas Project
Units 1 and 2
Docket No. STN 50-498, STN 50-499
Three-Month Response to Generic Letter 2008-01

- Reference: 1. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008
2. Letter from Scott Head to NRC Document Control Desk dated April, 9, 2008, "Due Date Extension for Three-Month Response to Generic Letter 2008-01". (NOC-AE-08002287) (ML081050250)

Because of the outage schedules for STP Unit 1 and Unit 2, STP Nuclear Operating Company (STPNOC) will not be able to complete all the necessary assessments to fully respond to Generic Letter (GL) 2008-01 by the requested nine-month date (October 11, 2008). STPNOC recognizes the importance of addressing the issues identified in the generic letter. This initial response is submitted in accordance with the GL 2008-01 provisions for a three-month response as modified by the Staff in reference 2 and describes STPNOC's plans for addressing and responding to the issues identified in GL 2008-01.

Commitments made in this letter are listed in the enclosure.

If there are any questions or if additional information is needed, please contact Ted Koser at (361) 972-8963 or me at (361) 972-7867.

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

Executed on 5/12/08
Date

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Three-Month Response to Generic Letter 2008-01

Requested Information

The U. S. Nuclear Regulatory Commission (NRC) issued NRC Generic Letter (GL) 2008-01 (Reference 1) to request that each licensee evaluate its Emergency Core Cooling System (ECCS), [Decay Heat Removal (DHR) system or Residual Heat Removal (RHR) system], and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within 9 months of the date of the GL to provide the following information:

- (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee "shall provide a response within 3 months of the date of the GL". In the 3 month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

Response

The requested description of all corrective actions pertaining to plant modifications requires the completion of a thorough physical walkdown of the system piping to confirm such things as adequate vent capability for system high points and that the design drawings reflect the as-built piping. Because STPNOC performed only limited evaluations of Unit 1 in its spring 2008 outage, and the evaluations planned for the Unit 2 will be performed in the fall 2008 outage which spans the due date for the GL response, STPNOC may not be able to identify all the necessary corrective actions by the October 11 due date for the response to the GL. Therefore, STPNOC is providing the requested 3-month response to describe STPNOC's plans to respond to GL 2008-01. STPNOC's plans for each Unit are described below.

Unit 1:

Because GL 2008-01 was issued so close to the Unit 1 spring refueling outage, the detailed walkdowns and evaluations inside the reactor containment requested in the GL could not be scheduled in time. Due to this, the requested information pertaining to STP Unit 1 corrective actions will not be complete by October 11, 2008. STPNOC was able to perform walkdowns of the portions of these systems inside containment that are not accessible at power to validate that vents shown on design drawings are installed and evaluate the piping configuration to determine consistency with the plant drawings. This effort did not involve scaffold erection, insulation removal or a rigorous determination of piping elevations. This was due to resources being unavailable to erect scaffolding or remove insulation and because the configuration would require an evaluation technique or tools that were not scheduled for the spring outage.

Unit 2:

The requested information pertaining to STP Unit 2 corrective actions will not be complete by October 11, 2008 due to the inability to finish detailed walkdowns of GL 2008-01 systems inside reactor containment during the 2008 fall refueling outage and evaluate the results before the due date. The Unit 2 fall outage spans the due date for the GL letter response and the walkdowns and evaluation of the results will be ongoing.

Actions For Both Units:

STPNOC plans to complete and submit by October 11, 2008 the needed reviews of the licensing basis, the design drawings, the testing and operating procedures, and the systems. The piping outside containment will be the subject of walkdowns. STPNOC will use the results of generic activities performed by the owners' group that are applicable to STP. This would include best practices for filling and venting, acceptance criteria for voids in discharge piping and in suction piping, guidance for potential sources of gas, and guidance for vent locations.

STPNOC will supplement the 9-month response to GL 2008-01 by January 30, 2009, to include the results of the Unit 2 evaluation and any additional Unit 1 evaluations determined to be necessary.

Basis for Acceptability:

STP has a robust, independent three train design that includes dedicated High Head Safety Injection (HHSI), Low Head Safety Injection (LHSI), Containment Spray (CS) and Residual Heat Removal (RHR) pumps. This independent, three train design minimizes the cross-connection issues on both the suction and discharge lines found in most two train designs. With the exception of the RHR system, which is entirely contained in the Reactor Containment Building, most suction lines for these systems can be walked down at power. Based on the adequacy of the current design basis (previous drawing reviews and/or design basis verifications), plant specific operational experience, and the results of previous system inspections, STPNOC believes that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

COMMITMENTS

The commitments in the following table identify the actions necessary to fulfill the commitments made in this letter in response to NRC Generic Letter 2008-01. Statements in this submittal with the exception of the one 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
STPNOC plans to submit the results of the reviews performed on the licensing basis, the design drawings, and the testing and operating procedures for the systems in the 9-month response. CR 08-796-10	October 11, 2008
STPNOC will supplement the 9-month response to GL 2008-01 to include the results of the Unit 2 evaluation and any additional Unit 1 evaluations determined to be necessary. CR 08-796-11	January 30, 2009