



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

May 20, 2008
NOC-AE-08002304
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 Amendment Related to Risk-Informed Initiative 5b
(TAC NOS. MD7058 AND MD7059)

Reference: Letter from Charles T. Bowman to NRC Document Control Desk dated October 23, 2007, "Proposed Revision to Technical Specifications to Relocate Surveillance Test Intervals to a Licensee-Controlled Program (Risk-Informed Initiative 5b)" (NOC-AE-07002218)

In the referenced letter, STP Nuclear Operating Company (STPNOC) submitted a license amendment request proposing to incorporate Risk-Informed Initiative 5b into the South Texas Project Technical Specifications. This submittal responds to NRC questions regarding this request received by letter dated April 8, 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 May 20, 2008
Date

Charles T. Bowman
General Manager, Oversight

Enclosure: STPNOC Response to Request for Additional Information

cc:

(paper copy)

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STPNOC RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**South Texas Project Units 1 and 2
Response to Request for Additional Information on the
Proposed Revision to Technical Specifications Regarding
Risk-Informed Initiative 5b
TAC Nos. MD7058 AND MD7059**

NRC RAI

The Nuclear Regulatory Commission (NRC) staff has reviewed the STP Nuclear Operating Company (STPNOC) request dated October 23, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073050348), for approval of an amendment to the South Texas Project, Units 1 and 2, technical specifications (TS) to relocate surveillance test intervals to a licensee-controlled program (risk-informed initiative 5b). 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 PRA Licensing Branch.

1. The staff has reviewed the scope of surveillance test intervals (STI) proposed to be relocated, and has identified several for which additional justification is required. The licensee is requested to address the following issues associated with specific STIs, or delete the STIs from the scope of the proposed TS changes.
 - a. Two surveillances, 4.1.1.1.a (which requires a 12-hour periodic verification of shutdown margin when one or more control rods are inoperable) and 4.4.8 Table 4.4-4 item 4a (which requires a 4-hour periodic isotopic analysis when the dose-equivalent iodine-131 activity exceeds prescribed limits) have equivalents in the Westinghouse Standard TS (STS), NUREG-1431, Rev. 3.1, as action requirements. Specifically, STS 3.1.4 required action B.2.3 provides for a once per 12 hours shutdown margin verification with inoperable control rod(s), and STS 3.4.16, required action A.1 provides for a once per 4 hour isotopic analysis with dose-equivalent iodine-131 exceeding limits. These STS actions are not subject to relocation to the Surveillance Frequency Control Program (SFCP) under TS Task Force (TSTF) traveler TSTF-425 referenced in the submittal.
 - b. Several surveillances require more frequent performance during abnormal plant conditions involving inoperable equipment:
 - Surveillance 4.1.1.4.b requires a 30-minute periodic verification of the Reactor Coolant System average temperature (T_{avg}) when a monitoring alarm is not reset.
 - Surveillance 4.1.3.1.1 requires a 4-hour periodic verification of individual rod positions when the rod position deviation monitor is inoperable.

- **Surveillance 4.1.3.6 requires a 4-hour periodic verification of control rod bank positions compared with insertion limits when the rod insertion limit monitor is inoperable.**
- **Surveillance 4.2.1.1.b requires a 60-minute and ultimately 30-minute monitoring and logging of the axial flux difference (AFD) when the AFD Monitor Alarm is inoperable.**
- **Surveillance 4.2.4.1.b requires a 12-hour periodic calculation of the quadrant power tilt ratio when the alarm is inoperable.**

None of these surveillances is found in the current revision of the STS; however, these surveillances are similar to the required actions identified in item a, which are not in the scope of TSTF-425. The staff's initial view is that these event-driven surveillance frequencies should not be relocated since they are not simply periodic requirements, but are condition-based.

- c. **Surveillance 4.8.1.2.1.b requires an 8-hour periodic verification of the alternate onsite emergency power source when it is used as a standby diesel generator in substitution for one of the required diesels, limited by a footnote to no more than 14 consecutive days. Although this requirement is not part of the standard TS, this surveillance is a plant-specific required action for an inoperable diesel generator, similar to the STS actions identified in item a. Therefore, the staff's initial view is that this surveillance frequency should not be relocated since it is an action requirement rather than a periodic surveillance.**

STP Response

While STPNOC believes that the changes proposed in the subject license amendment request meet the intent of the 5b Initiative, STPNOC has decided to withdraw the specific proposed changes to the Technical Specifications identified in the RAI. During the review of the RAI, two additional Technical Specifications, 4.1.3.2 and 4.2.4.2, were identified that also met the criteria identified in the RAI and have been added to the list of proposed Technical Specifications changes to be withdrawn. Therefore, STPNOC requests the proposed revision to the following Technical Specifications be withdrawn.

4.1.1.1.1.a
4.1.1.4.b
4.1.3.1.1
4.1.3.2
4.1.3.6
4.2.1.1.b
4.2.4.1.b
4.2.4.2
4.4.8 Table 4.4-4 item 4a
4.8.1.2.1.b

No other changes are being proposed to the subject amendment request by this letter.