Nuclear Operating Company

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

August 11, 2008
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File No.: G25

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Commitment Change Summary Report

Attached is the South Texas Project (STP) Commitment Change Summary Report for the period August 1, 2006 through July 30, 2008. This report lists each commitment for which a change was made during the reporting period and provides the basis for each change.

The commitments were evaluated in accordance with the requirements of STP's Regulatory Commitment Change Process, which is consistent with the guidance in the Nuclear Energy Institute's NEI 99-04, "Guideline for Managing NRC Commitments." Additional documentation is available at STP for your review.

There are no new commitments in this letter.

If there are any questions, please contact either Marilyn Kistler at 361-972-8385 or me at 361-972-7136.

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Attachment: Commitment Change Summary Report

A001
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ATTACHMENT

Commitment Change Summary Report

Condition Report Number	Source Document	Source Date	Date of Change	Original Commitment Description	Revised Commitment Description	Justification for Change
04-3365	NOC-AE-04001758 Response to Generic Letter 2003-01	08/05/2004	12/05/2006	NOC-AE-04001758, 08/05/04 - Response to Request for Information on NRC Generic Letter 2003-01 - Control Room Habitability Revise the control room dose accident analyses to reflect the results of the control room inleakage testing. Due Date December 31, 2005	Alternative: Revise the control room dose accident analyses to reflect the results of the control room inleakage testing. Due Date April 30. 2007.	The vendor for the analyses could not produce their deliverables on the needed schedule.
04-12498	NOC-AE-07002237 Response to Generic Letter 2004-02	12/10/2007	07/09/2008	NOC-AE-07002237, 12/10/2007 - Request for Extension for Final Response to Generic Letter 2004-02 and Implementation of Revised Design Basis for ECCS Sump Following completion of the 10 CFR 50, Appendix B activities described above and the associated changes to the STP licensing basis, STPNOC will submit a letter verifying completion of all GL 2004-02 corrective actions and confirming compliance with the regulatory requirements listed in GL 2004-02.	Submittal of letter verifying completion and confirming compliance will be submitted to the NRC by December 12, 2008.	Extension of date to adopt revised ECCS sump strainer design basis is an administrative change and has no effect on plant operations. NRC approval was provided by telephone July 1, 2008, and by correspondence dated July 2, 2008.
06-6838	NOC-AE-01001196 Proposed Amendment to Technical Specification 3.7.1.2	12/03/2001	05/25/2006	Commitment for SDG allowed outage time extension: The NRC Safety Evaluation (SE) lists the compensatory actions for extending the allowed outage times for the Standby Diesel Generators (TS 3.8.1.1), Essential Cooling Water (TS 3.7.4) and Essential Chilled Water (TS 3.7.14). The internal memo (HS-HS-35345) documents a phone call with the NRC that confirms that the intent of the SE was that the compensatory actions would be required if the outage duration would be longer than the original allowed outage time (i.e., longer than 72 hours). Commitment for AFW motor-driven pump allowed outage time extension (ref. NOC-AE-01001196):	Implementation of risk management actions will be based on reaching or expecting to reach the 1E-06 incremental core damage probability risk threshold instead of a prescribed time. This approach is consistent with the Risk Managed Technical Specifications (RMTS) Guidelines. The specific requirement in the RMTS Guidelines reads: For plant configurations in which the RMAT (Risk Management Action Threshold) either has been exceeded (emergent event) or is anticipated to be exceeded (either planned condition or emergent event), appropriate compensatory risk management actions shall be identified and implemented. For	The existing requirements for implementing risk management action (RMA) is simply based on being the configuration beyond a prescribed time. For the Standby Diesel Generator, Essential Cooling Water, and Essential Chilled Water, the RMA is implemented if the SSC will be inoperable for longer than the duration of the allowed outage time prior to approval of Amendment 85/72. For one inoperable MD Auxiliary Feedwater pump, the RMA will be implemented if the duration of the inoperable condition will exceed 14 days. These times are prescriptive and do not take into account the actual quantified risk of the plant configuration when the SSC is removed from service or becomes inoperable for an emergent condition. Implementation of the Maintenance Rule (MR) as described in 10CFR50.65(a)(4)

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				Compensatory measures will be used to offset the increased risk of allowing a 28-day AOT and will be implemented when it is recognized that maintenance on a motor-driven AFW pump will last for more than 14 days. Both commitments to implement compensatory actions are based on a prescriptive time. Procedure 0POP01-ZO-0006 is the implementing procedure for the compensatory action requirements.	preplanned maintenance activities for which the RMAT is anticipated to be exceeded, RMAs shall be implemented at the earliest appropriate time. The RMAT is the risk management action threshold and is established at 1E-06 incremental core damage probability or 1E-07 incremental large early release probability. RMAs are risk management actions (i.e., compensatory action). These thresholds are consistent with the thresholds used by STPNOC in implementing Maintenance Rule requirements.	requires an assessment of risk for maintenance and that the risk be managed. STPNOC has established a configuration risk management program (CRMP) to comply with the MR. Consistent with NUMARC 93-01, it establishes specific risk thresholds that require compensatory action if the configuration risk exceeds the threshold. The Non-Risk-Significant Threshold is established at an incremental core damage probability (ICDP) of 1E-06. RMA is required for configurations where the risk exceeds that threshold. STPNOC is an industry pilot for a risk-informed process for determining allowed outage times for the STP Technical Specifications (TS). The risk-informed process involves the application of the STP Configuration Risk Management Program (CRMP) to calculate a risk-informed completion time (RICT) based on the time required for the risk calculated for a plant configuration to attain a threshold. The risk thresholds, the process for calculating the configuration risk, and the requirements for PRA quality are described in the Electric Power Research Institute (EPRI) Risk Managed Technical Specification Guidelines (RMTS Guidelines). The RMTS Guidelines applies the same ICDP threshold for RMA as the MR. The RMTS Guidelines also establishes a incremental large early release probability (ILERP) threshold of 1E-07. These thresholds are known as risk management action thresholds (RMAT). The RMTS Guidelines specifically requires RMAs for conditions that exceed the RMAT: For plant configurations in which the RMAT either has been exceeded (emergent event) or is anticipated to be exceeded (either planned condition or emergent event), appropriate compensatory risk management actions shall be identified and implemented. For

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						preplanned maintenance activities for which the RMAT is anticipated to be exceeded, RMAs shall be implemented at the earliest appropriate time. This commitment change is described in the license amendment request for the risk-informed TS (NOC-AE-06002005). Revising the STP procedure to apply thresholds consistent with the MR and the RMTS Guidelines will establish an internally consistent risk-informed process with one set of criteria that are firmly grounded in industry and regulatory precedent.
07-457-66	NOC-AE-07002114 Phase 2 and 3 Mitigation Strategies NOC-AE-07002150 Phase 2 and 3 Mitigation Strategies – RAI Response AE-NOC-07001653 Safety Evaluation for EA-02-026	02/22/2007 05/14/2007 07/11/2007	12/12/2007	NOC-AE-07002114, Attachment 1, Page 4 of 18, Table A.2-3, SFP External Spray Strategy **General Description**, states in part: ...the preferred source of water will be firewater from a yard fire hydrant, if available, since it is more easily deployed. Water can also be supplied by pumping water from the Circulating Water System below ground piping located West of each Fuel Handling Building using the diesel driven portable pump. ...The strategy will be deployed within 2 hours when fuel is stored in an undispersed configuration. Similar commitments were made for the SFP External Makeup Strategy (Table A.2-2) on, Page 2 of 18, where it stated that the portable diesel driven pump can be supplied from several different long term sources and supplement the existing fire water system" to include ..." **Water Source & Capacity** "...1.2E7 gallons from the Circulating Water System."	For both the SFP External Makeup (Table A.2-2) and SFP External Spray (Table A.2-3) strategies the preferred source of water will be firewater from a yard fire hydrant, if available, since it is more easily deployed. Water can also be supplied by pumping water from the Circulating Water System below ground piping located West of each Fuel Handling Building using the diesel driven portable pump. Other sources are the Demineralized Water Storage Tank located east of the Unit 1 Fuel Handling Building or the Organics Basin located southeast of the Unit 2 Fuel Handling Building. ...The SFP External Makeup (Table A.2-2) and SFP External Spray (Table A.2-3) strategies will be capable of being deployed within 2 hours. **Water Source & Capacity:** "...there is available over 1.2E7 gallons from the Circulating Water System and approximately 1 million gallons from the Demineralized Water Storage	During revision of implementing procedures it was determined that the backup method of connecting the portable pump to draw from the identified Circulating Water locations in the procedure would take more than 2 hours. Therefore two other locations where it was deemed feasible to meet the 2 hour deployment time were identified. The Demineralized Water Storage Tank has a capacity of up to 1 million gallons. The Organics Basin contains water from outage activities and rain water. The capability to deploy the strategies within 2 hours and for at least 12 hours with onsite water sources will be met by the revised strategy. The preferred source of water will continue to be the firewater system from a yard fire hydrant, if available. There are options in the strategies for long term water supply by connecting the portable pump to draw water from the Demineralized Water Storage Tank, the Organics Basin, or the Circulating Water System (CWS) below ground piping to charge the fire header through a yard hydrant. The capability to set-up the portable pump to draw water

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				In addition, in NOC-AE-07002150, Attachment 1, Page 2 of 5, RAIs #5 and #8, STP clarified that both the SFP External Makeup (Table A.2-2) and SFP External Spray (Table A.2-3) strategies will be developed to deploy within 2 hours in accordance with NEI guidance.	Tank."	from the Demineralized Water Tank into the SFP within the 2 hour requirement has been validated (CR 07-457-65). The alternate water supplies are necessary because there may be competing needs for the firewater system. The equipment necessary to use these sources is staged and available. CREE 07-457-63 validates the flow rates using the Demineralized Water Tank as the water source. CREE 07-457-37 and 07-457-38 validate flow rates and capacities using the CWS which can be still be deployed but will require additional set-up time to access the CWS piping if the CWS is determined to be necessary. The commitment in NOC-AE-07002150, Attachment 1, RAI 8 Page 2 of 7, Table A.2-3 (SFP External Spray Strategy) further clarified that the strategy will be developed to deploy within 2 hours. The (implementing procedures) guidance will require that the strategy be deployed within 2 hours when fuel is not dispersed and no later than 5 hours when fuel is dispersed. While the spray strategy has been developed to ensure deployment within 2 hours, it can be deployed no later than 5 hours when fuel is in a dispersed configuration. These commitments were reflected in the Safety Evaluation for AE-NOC-07001653, Appendix B sections, 2.3.1 and section 2.3.2; however, the specific sources of water were not specified in the "Evaluation" section. It is acceptable to make this change without prior NRC notification and approval. The change will be reflected in the next periodic report of commitment changes and the NRC will be advised of the change during their 2008 inspection of B5b implementation under NRC TI 2515/171.

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07-491	NOC-AE-02001320 Control Room Envelope Ventilation System	04/25/2002	07/30/2008	Licensee Event Report 02-001 – CRE Ventilation System Failed to Maintain Positive Pressure in the Control Room Corrective Action #2: Revised the Electrical Auxiliary Building HVAC System procedure to include a description of the CRE HVAC boundary, a list of fire dampers that can affect CRE HVAC operability and general precautions reminding personnel that surrounding HVAC systems can affect CRE HVAC operability.	Revised 0POP02-HE-001, Electrical Auxiliary Building HVAC System to remove the description and list described above and to add procedure precautions section to state: During normal (non-emergency) modes of operation, system registers or access panels may be removed to facilitate inspection provided the following precautions are in place. A. Communications are established between the control room and the working group. B. In the event of an HVAC actuation to an emergency mode, the register or access panel is to be reinstalled immediately and secured in place. C. Notify the Control Room that the access panel or register has been reinstalled.	Replacing the damper tables and description in the addendum to the procedure with the instructions for communication with the control room provides Operations with positive and immediate configuration control of system boundaries rather than relying on a lengthy table of information. The use of the dedicated individual for control of the damper configuration is consistent with the guidance for manual actions in Regulatory Issue Summary 2005-20 (now in Part 9900 of the NRC Inspection Manual). The restoration process is simple and there are no environmental conditions that would impact the ability of a dedicated individual to reinstall an access cover or register. Incorporation of the guidance into the operating procedure makes future changes subject to a codified change process (i.e., 10 CFR 50.59). In accordance with NEI 99-04, this corrective action need not be tracked as a commitment. Note that this commitment change was not documented initially, and this justification was performed after the fact as a Condition Report action.