



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 10, 2008

Mr. Edward D. Halpin  
Chief Nuclear Officer  
STP Nuclear Operating Company  
South Texas Project  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 – CORRECTION TO PAGES ISSUED FOR AMENDMENT NOS. 185 AND 172 RE: ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER NO. TSTF-448, REVISION 3, "CONTROL ROOM ENVELOPE HABITABILITY" (TAC NOS. MD5942 AND MD5943)

Dear Mr. Halpin:

By letter dated July 29, 2008, the Nuclear Regulatory Commission (NRC) issued Amendment No. 185 to Facility Operating License No. NPF-76 and Amendment No. 172 to Facility Operating License No. NPF-80 for the South Texas Project, Units 1 and 2, respectively.

The amendments consisted of changes to the Technical Specifications (TSs) in response to your application dated June 26, 2007, as supplemented by letters dated April 29 and May 27, 2008. These changes relate to the NRC-approved TS Task Force (TSTF) Standard Technical Specification change traveler TSTF-448, Revision 3, "Control Room Envelope Habitability."

The NRC inadvertently issued amendment, license, and safety evaluation pages with incorrect TS section labels. TS sections were labeled Section 6.8.3.p instead of Section 6.8.3.q in both amendments, licenses, and the safety evaluation pages 7, 8, and 10. The corrected pages marked with revision bars are enclosed and should be replaced as follows:

<u>Remove</u>	<u>Insert</u>
Unit 1 amendment pages 2-3	Unit 1 amendment pages 2-3
Unit 2 amendment page 2	Unit 2 amendment page 2
Unit 1 license page 7	Unit 1 license page 7
Unit 2 license pages 6-7	Unit 2 license pages 6-7
Safety Evaluation pages 7, 8, and 10	Safety Evaluation pages 7, 8, and 10

E. Halpin

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These errors do not change the NRC staff's conclusions regarding Amendment Nos. 185 and 172. We regret any inconvenience caused by this error.

Sincerely,

A handwritten signature in black ink, appearing to read "Mohan C. Thadani".

Mohan C. Thadani, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:  
As stated

cc w/encls: See next page

South Texas Project, Units 1 and 2

10/01/2008

cc:

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ENCLOSURES

SOUTH TEXAS PROJECT, UNITS 1 AND 2

CORRECTION TO PAGES ISSUED FOR AMENDMENT NOS. 185 AND 172

RE: ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)

TRAVELER NO. TSTF-448, REVISION 3, "CONTROL ROOM ENVELOPE

HABITABILITY" (TAC NOS. MD5942 AND MD5943)

1. Unit 1 Amendment 185 pages 2-3
2. Unit 2 Amendment 172 page 2
3. Unit 1 Amendment 185 License page 7
4. Unit 2 Amendment 172 License pages 6-7
5. Amendment 185/172 Safety Evaluation pages 7, 8, and 10

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-76 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 185, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. In addition, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(12) of Facility Operating License No. NPF-76 is hereby amended to read as follows:

- (12) Control Room Envelope Habitability

Upon implementation of this License Amendment Request adopting TSTF-448, Revision 3, the determination of CRE unfiltered air leakage as required by SR 4.7.7.e.3, in accordance with TS 6.8.3.q.3.(i), the assessment of CRE habitability as required by Specification 6.8.3.q.3.(ii), and the measurement of CRE pressure as required by Specification 6.8.3.q.4, shall be considered met. Following implementation:

- (a) For Unit 1, the first performance of SR 4.7.7.e.3, in accordance with Specification 6.8.3.q.3.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from March 9, 2004, the date of the most recent successful tracer gas test, as stated in the letter from T.J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758), response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
    - (b) For Unit 1, the first performance of the periodic assessment of CRE habitability, Specification 6.8.3.q.3.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 9, 2004, the date of the most recent successful tracer gas test, as stated in the letter from T.J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758), response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

- (c) For Unit 1, the first performance of the periodic measurement of CRE pressure, Specification 6.8.3.q.4, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from April 30, 2007, the date of the most recent successful pressure measurement test.
4. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Mohan C. Thadani, Acting Chief  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Facility Operating  
License No. NPF-76 and the  
Technical Specifications

Date of Issuance: July 29, 2008

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-80 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 172, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. In addition, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(10) of Facility Operating License No. NPF-80 is hereby amended to read as follows:

- (10) Control Room Envelope Habitability

Upon implementation of this License Amendment Request adopting TSTF-448, Revision 3, the determination of CRE unfiltered air inleakage as required by SR 4.7.7.e.3, in accordance with TS 6.8.3.q.3.(i), the assessment of CRE habitability as required by Specification 6.8.3.q.3.(ii), and the measurement of CRE pressure as required by Specification 6.8.3.q.4, shall be considered met. Following implementation:

- (a) For Unit 2, the first performance of SR 4.7.7.e.3, in accordance with Specification 6.8.3.q.3.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from February 12, 2007, the date of the most recent successful tracer gas test, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
    - (b) For Unit 2, the first performance of the periodic assessment of CRE habitability, Specification 6.8.3.q.3.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from February 12, 2007, the date of the most recent successful tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
    - (c) For Unit 2, the first performance of the periodic measurement of CRE pressure, Specification 6.8.3.q.4, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from February 16, 2007, the date of the most recent successful pressure measurement test.

6. Training on integrated fire response strategy
  7. Spent fuel pool mitigation measures
- c. Actions to minimize release to include consideration of:
1. Water spray scrubbing
  2. Dose to onsite responders

(12) Control Room Envelope Habitability

Upon implementation of this License Amendment Request adopting TSTF-448, Revision 3, the determination of CRE unfiltered air leakage as required by SR 4.7.7.e.3, in accordance with TS 6.8.3.q.3.(i), the assessment of CRE habitability as required by Specification 6.8.3.q.3.(ii), and the measurement of CRE pressure as required by Specification 6.8.3.q.4, shall be considered met. Following implementation:

- a. For Unit 1, the first performance of SR 4.7.7.e.3, in accordance with Specification 6.8.3.q.3.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from March 9, 2004, the date of the most recent successful tracer gas test, as stated in the letter from T.J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758), response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- b. For Unit 1, the first performance of the periodic assessment of CRE habitability, Specification 6.8.3.q.3.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 9, 2004, the date of the most recent successful tracer gas test, as stated in the letter from T.J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758), response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- c. For Unit 1, the first performance of the periodic measurement of CRE pressure, Specification 6.8.3.q.4, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from April 30, 2007, the date of the most recent successful pressure measurement test.

(9) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- a. Fire fighting response strategy with the following elements:
  - 1. Pre-defined coordinated fire response strategy and guidance
  - 2. Assessment of mutual aid fire fighting assets
  - 3. Designated staging areas for equipment and materials
  - 4. Command and control
  - 5. Training of response personnel
- b. Operations to mitigate fuel damage considering the following:
  - 1. Protection and use of personnel assets
  - 2. Communications
  - 3. Minimizing fire spread
  - 4. Procedures for implementing integrated fire response strategy
  - 5. Identification of readily-available pre-staged equipment
  - 6. Training on integrated fire response strategy
  - 7. Spent fuel pool mitigation measures
- c. Actions to minimize release to include consideration of:
  - 1. Water spray scrubbing
  - 2. Dose to onsite responders

(10) Control Room Envelope Habitability

Upon implementation of this License Amendment Request adopting TSTF-448, Revision 3, the determination of CRE unfiltered air inleakage as required by SR 4.7.7.e.3, in accordance with TS 6.8.3.q.3.(i), the assessment of CRE habitability as required by Specification 6.8.3.q.3.(ii), and the measurement of CRE pressure as required by Specification 6.8.3.q.4, shall be considered met. Following implementation:

- a. For Unit 2, the first performance of SR 4.7.7.e.3, in accordance with Specification 6.8.3.q.3.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from February 12, 2007, the date of the most recent successful tracer gas test, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

- b. For Unit 2, the first performance of the periodic assessment of CRE habitability, Specification 6.8.3.q.3.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from February 12, 2007, the date of the most recent successful tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- c. For Unit 2, the first performance of the periodic measurement of CRE pressure, Specification 6.8.3.q.4, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from February 16, 2007, the date of the most recent successful pressure measurement test.

D. Exemptions

The following exemptions are authorized by law and will not endanger life or property or the common defense and security, and certain special circumstances are present. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- (1) The facility requires a technical exemption from the requirements of 10 CFR Part 50, Appendix J, Section III.D.2(b)(ii). The justification for this exemption is contained in Section 6.2.6 of Supplement 3 to the Safety Evaluation Report. The staff's environmental assessment was published on December 16, 1986 (53 FR 50605). Therefore, pursuant to 10 CFR 50.12(a)(1), 10 CFR 50.12(a)(2)(ii) and (iii), the South Texas Project Unit 2 is hereby granted an exemption from the quoted requirement and instead, is required to perform the overall air lock leak test at pressure  $P_a$  prior to establishing containment integrity if air lock maintenance has been performed that could affect the air lock sealing capability.

conditions. These changes are, therefore, acceptable from a regulatory standpoint in that they meet 10 CFR 50.36.

### 3.0 TECHNICAL EVALUATION

The NRC staff reviewed the proposed changes against the corresponding changes made to the STS by TSTF-448, Revision 3, which the NRC staff has found to satisfy applicable regulatory requirements, as described above in Section 2.0. The emergency operational mode of the CRMCFS at STP pressurizes the CRE to minimize unfiltered air inleakage. The proposed changes are consistent with this design.

#### 3.1 Proposed Changes to Facility Operating License Nos. NPF-76 and NPF-80

The following new condition is to be added to facility operating license NPF-76 for STP Unit 1:

##### (12) Control Room Envelope Habitability

Upon implementation of this License Amendment Request adopting TSTF-448, Revision 3, the determination of CRE unfiltered air inleakage as required by SR 4.7.7.e.3, in accordance with TS 6.8.3.q.3.(i), the assessment of CRE habitability as required by Specification 6.8.3.q.3.(ii), and the measurement of CRE pressure as required by Specification 6.8.3.q.4, shall be considered met. Following implementation:

- (a) For Unit 1, the first performance of SR 4.7.7.e.3, in accordance with Specification 6.8.3.q.3.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from March 9, 2004, the date of the most recent successful tracer gas test, as stated in the letter from T.J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758), response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) For Unit 1, the first performance of the periodic assessment of CRE habitability, Specification 6.8.3.q.3.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 9, 2004, the date of the most recent successful tracer gas test, as stated in the letter from T.J. Jordan, STP Nuclear Operating Company, to the NRC Document Control Desk, dated August 5, 2004 (NOC-AE-04001758), response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) For Unit 1, the first performance of the periodic measurement of CRE pressure, Specification 6.8.3.q.4, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from April 30, 2007, the date of the most recent successful pressure measurement test.

The following new condition is to be added to facility operating license NPF-80 for STP Unit 2:

(10) Control Room Envelope Habitability

Upon implementation of this License Amendment Request adopting TSTF-448, Revision 3, the determination of CRE unfiltered air inleakage as required by SR 4.7.7.e.3, in accordance with TS 6.8.3.q.3.(i), the assessment of CRE habitability as required by Specification 6.8.3.q.3.(ii), and the measurement of CRE pressure as required by Specification 6.8.3.q.4, shall be considered met. Following implementation:

- (a) For Unit 2, the first performance of SR 4.7.7.e.3, in accordance with Specification 6.8.3.q.3.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from February 12, 2007, the date of the most recent successful tracer gas test, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) For Unit 2, the first performance of the periodic assessment of CRE habitability, Specification 6.8.3.q.3.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from February 12, 2007, the date of the most recent successful tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) For Unit 2, the first performance of the periodic measurement of CRE pressure, Specification 6.8.3.q.4, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from February 16, 2007, the date of the most recent successful pressure measurement test.

3.2 Proposed Changes

The proposed amendments would strengthen CRE habitability TS requirements by changing TS 3.7.7, Control Room Makeup and Cleanup Filtration (CRMCF) System, and adding a new TS administrative controls program on CRE habitability. Accompanying the proposed TS changes are appropriate conforming technical changes to the TS Bases. The proposed revision to the Bases also includes editorial and administrative changes to reflect applicable changes to the corresponding STS Bases, which were made to improve clarity, conform to the latest information and references, correct factual errors, and achieve more consistency among the STS NUREGs. Except for plant-specific differences and changes that were necessary due to STP being a Custom TS plant, all of these changes are consistent with STS as revised by TSTF-448, Revision 3.

The NRC staff compared the proposed TS changes to the STS and the STS markups and evaluations in TSTF-448. The staff verified that differences from the STS were adequately justified on the basis of plant-specific design or retention of current licensing basis. The NRC staff also reviewed the proposed changes to the TS Bases for consistency with the STS Bases

most anticipated problems with the CRE boundary. Therefore, proposed Actions d.1, d.2, and d.3 are acceptable.

The licensee also proposed to revise the existing Conditions a, b, and c in TS 3.7.7. The existing conditions address the action statements to address the inoperability of one or more CRMCF Systems. Conditions a, b, and c address the inoperability of one CRMCF System, two CRMCF Systems, and three CRMCF Systems, respectively. To distinguish new Condition d from the existing conditions for inoperable CRMCFs, the existing Conditions a, b, and c would be revised to state that their applicability excludes the new Condition d. For example, Condition a would be revised to state, "With one Control Room Makeup and Cleanup Filtration System inoperable for reasons other than condition d ---." Conditions b and c would also be revised similarly. The changes to existing Conditions a, b, and c are less restrictive because these Conditions will no longer apply in the event the CRMCF Systems are inoperable due to an inoperable CRE boundary during operation in MODES 1, 2, 3, and 4. This is acceptable because the new Action d establishes adequate remedial measures in this condition.

In the emergency radiation mode of operation, the CRMCFs isolate normal unfiltered outside air intake path, filters the emergency ventilation air supply to the CRE, and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to delete the CRE pressurization SR. This SR requires verifying that the CRMCFs operating in the emergency radiation mode can maintain a pressure of  $\geq 0.25$  inches water gauge relative to all adjacent areas during the pressurization mode of operation at a makeup flow rate of  $\leq 2000$  cubic feet per minute (cfm). The deletion of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In responses to GL 2003-01, dated December 9, 2003, and August 4, 2004 (ADAMS Accession Nos. ML033500387 and ML042260183, respectively), the licensee made a commitment to revise the TS to include periodic verification of control room in-leakage in accordance with TSTF-448. Accordingly, the licensee has now proposed to revise the current CRE pressurization surveillance, SR 4.7.7.e.3, with an inleakage measurement SR and a CRE Habitability Program in TS Section 6.8.3.q, in accordance with the approved version of TSTF-448. Based on the adoption of TSTF-448, Revision 3, the licensee's proposed revision to SR 4.7.7.e.3 is acceptable.

The proposed CRE inleakage measurement SR 4.7.7.e.3 states, "Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program." The CRE Habitability Program TS, proposed in TS 6.8.3.q, requires that the program include "Requirements for determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0 (Reference 5). This guidance references ASTM E741 (Reference 2) as an acceptable method for ascertaining the unfiltered leakage into the CRE. The licensee has proposed to follow this method. Therefore, the proposed CRE inleakage measurement SR is acceptable.

November 10, 2008

E. Halpin

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These errors do not change the NRC staff's conclusions regarding Amendment Nos. 185 and 172. We regret any inconvenience caused by this error.

Sincerely,  
/RA/

Mohan C. Thadani, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:  
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