

Proprietary



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

May 26, 2009
U7-C-STP-NRC-090050
10 CFR 2.390
10 CFR 52.80(d)

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

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Submittal of Mitigative Strategies Report – 10 CFR 52.80(d)

Reference: Letter, Scott Head to Document Control Desk, "10 CFR 52.80(d) Report Submittal" dated April 27, 2009 U7-C-STP-NRC-090041 (ML091200385)

In the referenced letter STP Nuclear Operating Company (STPNOC) stated plans to submit a 52.80(d) Report in late May 2009, approximately the same time the Rule becomes effective. STPNOC hereby submits the site-specific Mitigative Strategies Report in accordance with 10 CFR 52.80(d) and 50.54(hh)(2) identifying the strategies South Texas Project (STP) Units 3 and 4 will implement in the unlikely event that a large area of the facility is lost due to fires or explosions. The attached report was prepared using the guidance of NUREG-0800 Subsection 13.6.5 and NEI 06-12, "B.5.b Phase 2 and 3 Submittal Guideline," Rev. 2. Additionally, the attached Mitigative Strategies Report contains Security Related Information and is requested to be withheld from public disclosure in accordance with 10 CFR 2.390. Enclosure 1 documents the Commitments contained in this letter.

This report will be incorporated as a new Part 11 into the STP Units 3 and 4 Combined License Application in Revision 3, scheduled for submittal to the NRC in September 2009.

In preparing this report STPNOC evaluated the responses from STP Units 1 and 2 for applicability to STP Units 3 and 4. Common areas were incorporated into the Units 3 and 4 responses as well as lessons learned from the Units 1 and 2 activities.

Should you have any questions regarding this report, please contact me at 361-972-7136 or Bill Mookhoek at 361-972-7274.

STI 32475668

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

Executed on 5/26/09



Scott Head
Manager, Regulatory Affairs
South Texas Project Units 3 & 4

fjp

Attachment: South Texas Project Units 3 and 4, Mitigative Strategies Report 10 CFR 52.80(d)

Enclosure: Commitments

cc: w/o attachment except*
(paper copy)

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