

## PMSTPCOL PEmails

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**From:** Foster, Rocky  
**Sent:** Wednesday, May 20, 2009 11:23 AM  
**To:** jetomkins@stpegs.com  
**Cc:** Joseph, Stacy; STPCOL  
**Subject:** Draft RAI Chapter 06.01.02  
**Attachments:** Draft RAI 2568.pdf

Jim,

Attached is a draft RAI for Chapter 06.01.02 of the STP COLA. Please review and provide me with feedback on the need for clarification, or if I can formally issue them to STP as is.

Thanks,

Rocky D. Foster  
Project Manager  
US Nuclear Regulatory Commission  
Office of New Reactors  
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**From:** Foster, Rocky

**Created By:** Rocky.Foster@nrc.gov

**Recipients:**

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Tracking Status: None  
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Request for Additional Information No. 2568 Revision 2

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 06.01.02 - Protective Coating Systems (Paints) - Organic Materials  
Application Section: 6.1

QUESTIONS for Component Integrity, Performance, and Testing Branch 2 (ESBWR/ABWR Projects)  
(CIB2)

06.01.02-\*\*\*

Please discuss your plans to revise the STP COL application to reflect the current NRC guidance for the use of protective coatings inside containment. FSAR Section 6.1.3.1 and COM 6.1-2, which are based on COL Item 6.1, describe a commitment to provide an analysis of containment coatings “not complying with the requirements of Regulatory Guide 1.54 and ANSI N101.2.” ANSI N101.2 has been withdrawn and the regulatory positions in RG 1.54 (Rev. 1, July 2000) now refer to ASTM Standard D5144, D3911, and other related ASTM standards. In the 2007 revision of SRP Section 6.1.2, the acceptance criteria are the regulatory positions of RG 1.54 and the ASTM Standards D5144-00 and D3911-03.

06.01.02-\*\*\*

Please describe in the STP 3&4 FSAR how the evaluation of combustible gas generation for the non-conforming (with respect to RG 1.54 and associated industry standards) coatings and organic materials in containment will be documented and retained in the plant quality records as part of the 10 CFR 50, Appendix B quality assurance program (COL Information Item 6.1).

06.01.02-\*\*\*

Please propose a license condition for completing the inventory and analysis of non-conforming protective coatings and organic materials used inside containment of the as-built plant. The license condition should include making the analysis available for NRC review prior to initial fuel load. This information is needed to address COL Information Item 6.1 and cannot be provided prior to construction.