

June 25, 2009

Mr. Scott Head, Manager  
Regulatory Affairs  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 133 RELATED TO  
THE SRP SECTIONS 13.01.01, 13.01.02 - 13.01.03, 13.02.02, 13.05.01.01 AND  
13.05.02.01 FOR THE SOUTH TEXAS COMBINED LICENSE APPLICATION

Dear Mr. Head:

By letter dated September 20, 2007, STP Nuclear Operating Company (STPNOC) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U. S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

S. Head

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If you have any questions or comments concerning this matter, I can be reached at 301-415-5787 or by e-mail at [rocky.foster@nrc.gov](mailto:rocky.foster@nrc.gov).

Sincerely,

**/RA/**

Rocky D. Foster, Project Manager  
ESBWR/ABWR Projects Branch 2  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos.: 52-012  
52-013

eRAI Tracking No. 2892, 2894, 2893, 2957 and 2956

Enclosure:  
Request for Additional Information

cc: William Mookhoek

S. Head

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If you have any questions or comments concerning this matter, I can be reached at 301-415-5787 or by e-mail at [rocky.foster@nrc.gov](mailto:rocky.foster@nrc.gov).

Sincerely,

**/RA/**

Rocky D. Foster, Project Manager  
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Docket Nos.: 52-012  
52-013

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Enclosure:  
Request for Additional Information

cc: William Mookhoek

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\*Approval captured electronically in the electronic RAI system.

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**South Texas Project Units 3 and 4**  
**South Texas Project Nuclear Operating Co**  
**Docket No. 52-012 and 52-013**  
**SRP Section: 13.01.01 - Management and Technical Support Organization**  
**Application Section: 13.1**

QUESTIONS for Operating Licensing and Human Performance Branch (COLP)

**13.01.01-1**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.A.vi states that the following aspects of the implementation or delegation of design and construction responsibilities for material and component specification review and approval should be described. FSAR Section 13.1 states that material and component specification review and approval are described in the QAPD.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL QAPD.

**13.01.01-2**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.A.vii states that the following aspects of the implementation or delegation of design and construction responsibilities for procurement of materials and equipment should be described. FSAR Section 13.1 does not appear to include a description of the plan to procure of materials and equipment.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-3**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.A.viii states that the following aspects of the implementation or delegation of design and construction responsibilities for management of construction activities should be described. FSAR Section 13.1 does not appear to include a description of the plan to manage of construction activities.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-4**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.i states that the applicant should provide a description of the plan for the development of plans for the preoperational and startup testing of the facility. FSAR Section 13.1 does not appear to include a description of the plan to conduct preoperational and startup testing of the facility.

Enclosure

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-5**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.iv states that the applicant should provide a description of the design and construction and preoperational responsibilities and how these responsibilities are assigned by the applicant's headquarters staff and implemented within the organizational units. FSAR section 13.1 does not appear to include a description of how these responsibilities are assigned.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-6**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.vi states that the applicant should provide a description of the estimated number of persons to be assigned to each unit with responsibility for the project. FSAR section 13.1 does not appear to include a description of the estimated number of persons to be assigned to each unit with responsibility for the project.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-7**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.vii states that the applicant should provide a description of the general educational and experience requirements for identified positions or classes of positions of those individuals having design, construction, and preoperational responsibilities. FSAR section 13.1 does not appear to include a description of the general educational and experience requirements for those individuals.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-8**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.viii states that the applicant should provide a description of the design and construction and preoperational responsibilities and how the applicant's management interfaces with the NSSS and AE organizations. FSAR Section 13.1 does not appear to include a description of the interfaces with the NSSS and AE organizations.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-9**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.ix states that the applicant should provide a description of the educational and experience required for management and supervisory positions having design, construction, and preoperational responsibilities. FSAR Section 13.1 does not appear to include a description of these educational and experience requirements.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-10**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.x states that the applicant should provide a description of the required review of contractor work during design and construction and reoperation. FSAR section 13.1 does not appear to include a description of the reviews of contractor work during design and construction and reoperation.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-11**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.1.B.xi states that the applicant should provide a description of the positions that have functional responsibilities in addition to the COL application, the expected proportion of time assigned to the other activities. FSAR section 13.1 does not appear to include the expected proportion of time assigned to the other activities.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-12**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.2.B states the applicant to provide the relationship of the nuclear-oriented part of the organization to the rest of the corporate organization. FSAR section 13.1 does not appear to include this relationship.

Please identify the location of this information in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**13.01.01-13**

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," Section I.2 requests the applicant describe the provisions for technical support for operations, give the approximate

numbers of and describe educational and experience requirements for, each identified position or class of positions providing technical support for plant operations, and include specific educational and experience requirements for individuals holding the management and supervisory positions in organizational units providing support in the areas identified as items I.2.E – I.2.P. FSAR Section 13.1 does not appear to include this information.

Please identify the location of information related to numbers of personnel listed in SRP Sections I.2.E – 1.2.P in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

#### **13.01.01-14**

Standard Review Plan Section 13.1.1, “Management and Technical Support Organization,” Section I.2 requests the applicant describe the provisions for technical support for operations, give the approximate numbers of and describe educational and experience requirements for, each identified position or class of positions providing technical support for plant operations, and include specific educational and experience requirements for individuals holding the management and supervisory positions in organizational units providing support in the areas identified as items I.2.E – I.2.P. FSAR Section 13.1 does not appear to include this information.

Please identify the location of information related to specific educational and experience requirements for managers and supervisors listed SRP Sections I.2.E – 1.2.P in the South Texas Project Units 3 and 4 COL application, or justify its exclusion.

**South Texas Project Units 3 and 4**  
**South Texas Project Nuclear Operating Co**  
**Docket No. 52-012 and 52-013**  
**SRP Section: 13.01.02-13.01.03 - Operating Organization**  
**Application Section: 13.1**

QUESTIONS for Operating Licensing and Human Performance Branch (COLP)

**13.01.02-13.01.03-1**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” Section I.1.G states that the organizational information provided by the applicant should include a schedule, relative to fuel loading for each unit, for filling all positions. FSAR Section 13.1 does not appear to include a schedule, relative to fuel loading for each unit, for filling all positions.

Please identify the location of this information in the South Texas Project Units 3 and 4 application, or justify its exclusion.

**13.01.02-13.01.03-2**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” section I.2.A states that the applicant should provide the following organizational information:

- an organization with the title of each position,
- the minimum number of persons to be assigned to duplicated positions,
- the number of operating shift crews,
- the positions for which reactor operator and senior reactor operator licenses are required.

FSAR Section 13.1 does not appear to include an organization chart with this information.

Please identify the location of this information in the South Texas Project Units 3 and 4 application or justify its exclusion.

**13.01.02-13.01.03-3**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” section I.2.B states that the applicant should provide the following organizational information - the personnel resumes for those selected for management and supervisory positions down through the shift supervisor. FSAR Section 13.1 does not appear to include an organization chart with this information.

Please identify the location of this information in the South Texas Project Units 3 and 4 application or justify its exclusion.

**13.01.02-13.01.03-4**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” Section I.2.C requests the applicant provide the functions, responsibilities, and authorities of the following plant positions or their equivalents:

- vii. technical supervisors
- ix. instrumentation and controls maintenance supervisors
- x. equipment maintenance supervisors
- xii. quality assurance supervisor

FSAR section 13.1 does not appear to include the functions, responsibilities, and authorities for those positions.

Please identify the location of this information in the South Texas Project Units 3 and 4 application, or justify its exclusion.

**13.01.02-13.01.03-5**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” section I.2.D states that applicant provide the line of succession of authority and responsibility for overall station operation in the event of unexpected contingencies of a temporary nature, and the delegation of authority that may be granted to operations supervisors and to shift supervisors, including the authority to issue standing or special orders. FSAR Section 13.1 does not appear to include this information.

Please identify the location of this information in the South Texas Project Units 3 and 4 application, or justify its exclusion.

**13.01.02-13.01.03-6**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” section I.2.E states that applicant provide the extent and nature of the participation of the plant operating and technical staff in the initial test program. FSAR section 13.1 does not appear to include the extent and nature of the participation of the plant operating and technical staff in the initial test program.

Please identify the location of this information in the South Texas Project Units 3 and 4 application, or justify its exclusion.

**13.01.02-13.01.03-7**

Standard Review Plan Section 13.1.2 - 13.1.3, “Operating Organization,” Section I.2.G, asks the applicant to describe the position titles, operator licensing requirements for each position, and the total number of personnel that will man each shift for all combinations of units planned for the station in both operating and cold shutdown modes. Shift crew staffing plans specific to refueling operations should be described. The proposed means of assigning shift responsibility for implementing the radiation protection and fire protection programs on a round-the-clock basis should also be described. FSAR Section 13.1 does not appear to include this information.

Please identify the location of this information in the South Texas Project Units 3 and 4 application, or justify its exclusion.

**13.01.02-13.01.03-8**

Standard Review Plan Section 13.1.2 – 13.1.3, “Operating Organization,” Section I.2.H states that applicant should provide the education, training, and experience requirements for those personnel in the management, operating, technical, and maintenance position categories in the operating organization who will do the preoperational and startup tests. FSAR Section 13.1 does not appear to include the education, training, and experience requirements for those personnel in the management, operating, technical, and maintenance position categories in the operating organization who will do the preoperational and startup tests.

Please identify the location of this information in the South Texas Project Units 3 and 4 application, or justify its exclusion.

**South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 13.02.02 - Non-Licensed Plant Staff Training  
Application Section: 13.2 Training**

QUESTIONS for Operating Licensing and Human Performance Branch (COLP)

**13.02.02-1**

NUREG-0800, Standard Review Plan (SRP) Section 13.2.2.1.1 and subparts B, C, & D., require the training programs to be scheduled relative to the loading of fuel, i.e., some 18 months prior to fuel load and some before fuel load. Many of the Operational Programs of Table 13.4S-1, simply state 'fuel load' or 'receipt of fuel' for the milestone. This could be interpreted to be anytime during fuel load or anytime during receipt of fuel. This Table, therefore, does not meet the intent of the SRP and does not accurately reflect the SRP requirement for program implementation. Please modify Table 13.4S-1 to accurately reflect the SRP requirements or describe how the 'fuel based' timing requirements are going to be met for the programs listed in Table 13.4S-1.

**South Texas Project Units 3 and 4**  
**South Texas Project Nuclear Operating Co**  
**Docket No. 52-012 and 52-013**  
**SRP Section: 13.05.01.01 - Administrative Procedures - General**  
**Application Section: 13.5.3.3.1(3) and (4)**

QUESTIONS for Operating Licensing and Human Performance Branch (COLP)

**13.05.01.01-1**

NUREG-0800, Standard Review Plan Section 13.5.1.1.I states "the application should describe the nature and content of the procedures detailed below". STP 3 & 4, FSAR, Section 13.5.3.4.1, lists the required procedures per NUREG-0800. However, 13.5.3.3.1.(3) and (4) state a review of existing STP procedures will be conducted and any necessary changes made to the existing procedures. Simply stating this in the FSAR does not meet the intent of NUREG-0800. Please revise the FSAR to meet the intent of NUREG-0800, Section 13.5.1.1 or explain how it meets the intent as it currently exists.

**South Texas Project Units 3 and 4**  
**South Texas Project Nuclear Operating Co**  
**Docket No. 52-012 and 52-013**  
**SRP Section: 13.05.02.01 - Operating and Emergency Operating Procedures**  
**Application Section: 13.5**

QUESTIONS for Operating Licensing and Human Performance Branch (COLP)

**13.05.02.01-1**

NUREG-0800, Section 13.5.2.1, states that the PGP for EOP's must be submitted for NRC review not later than three months before the date formal operator training on EOP's is to begin. The FSAR, Section 13.5.3.2 (7), states that the EOPs will also be completed in time to support the Plant Operations Training Program.

Clarify when the PGP will be submitted for NRC review.

**13.05.02.01-2**

NUREG-0800, Section 13.5.2.1, states that the PGP should include a plant-specific writer's guide (P-SWG). The FSAR, Section 13.5.3.2 (2), states that an emergency operating procedure (EOP) writer's guide will be developed and implemented.

Clarify whether the EOP writer's guide referenced in the FSAR will be plant specific.

**13.05.02.01-3**

NUREG-0800, Section 13.5.2.1, states that EOP's are to be based on plant-specific technical guidelines (P-STG's). The FSAR, Section 13.5.3.2 (3), discusses EOP's, and FSAR, Section 13.5.3.2 (4), discusses P-STG's.

Clarify the relationship between EOP's and P-STG's.