



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

July 22, 2009

U7-C-STP-NRC-090077

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
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South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Response to Request for Additional Information

Attached is a response to two NRC staff questions included in Request for Additional Information (RAI) letter number 134 related to Combined License Application (COLA) Part 2, Tier 2, Section 6.5.

Attachments 1 and 2 address the responses to the RAI questions listed below:

RAI 06.05.01-1
RAI 06.05.01-2

There are no commitments in this letter.

If you have any questions regarding this response, please contact me at (361) 972-7136, or Bill Mookhoek at (361) 972-7274.

STI 32505847

DOA
NRO

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

Executed on 7/22/09



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

jet

Attachments:

1. Question 06.05.01-1
2. Question 06.05.01-2

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

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RAI 06.05.01-1:

QUESTION:

COL License Information Item 6.5.5.1 for SGTS Performance states that a secondary containment drawdown analysis will be performed. Confirm that the drawdown analysis is not intended to be a substitution for physical draw down testing required by Technical Specification Surveillance SR 3.6.4.1.4.

RESPONSE:

A secondary containment drawdown analysis as described in COLA Subsection 6.5.5.1 will be performed for STP 3 & 4 in accordance with the COL License Information Item in 6.5.5.1 (SGTS Performance). This will be a one-time analysis performed prior to pre-operational testing. This drawdown analysis is not a substitute for physical drawdown testing. Verification that each standby gas treatment subsystem will draw down the secondary containment will be performed as required by Technical Specification Surveillance Requirement SR 3.6.4.1.4.

There are no changes to the COLA as a result of this RAI response.

RAI 06.05.01-2:**QUESTION:**

COL License Information Item in 6.5.5.2 of the ABWR DCD requires that the capability of the Standby Gas Treatment System (SGTS) be demonstrated to be capable to perform its intended function in the event of a LOCA if more than 90 hours of operation per year for either train is anticipated by plant operations based on the operating experience. Since the SGTS is a standby system that does not operate normally, operation over 90 hours in one year would be an unusual occurrence and may be caused by the need to remove smoke or other contaminants from the reactor building. Of specific importance is the efficiency of the charcoal adsorber which may degrade with operation. Demonstrate how an analysis can qualify the charcoal adsorber to the efficiency levels assumed in the design basis LOCA analysis or perform appropriate laboratory testing of the charcoal adsorber.

RESPONSE:

The purpose of the SGTS is to limit the discharge of radioactivity to the environment on receipt of a signal from the Leak Detection System (LDS). The SGTS is on standby during normal plant operation, and manual operation of the SGTS is described in FSAR section 6.5.1.2.3.2.

The SGTS will be tested in accordance with Regulatory Guide 1.52, Revision 2 and ASME N510-1989 as specified in Technical Specification 5.5.2.7 Ventilation Filter Testing Program (VFTP), at the frequencies specified in Regulatory Guide 1.52, Revision 2, and Technical Specification 5.5.2.7 (VFTP). Regulatory Guide 1.52, Revision 2, Position C.6 also requires testing following painting, fire, or chemical release in any ventilation zone communicating with the system.

If 90 hours of operation per year for either train (excluding tests) is to be exceeded then appropriate laboratory testing of a representative sample of charcoal adsorber will be performed in accordance with Regulatory Guide 1.52, Revision 2, and Technical Specification 5.5.2.7 (VFTP) to demonstrate that the SGTS is capable of performing its intended function in the event of LOCA.

FSAR Subsection 6.5.5.2 will be revised as shown below.

The following standard supplement addresses COL License Information Item 6.9a.

The capability of the SGTS system to perform its intended function in the event of a LOCA will be demonstrated by analysis appropriate laboratory testing of a representative sample of charcoal adsorber in accordance with Regulatory Guide 1.52, Revision 2, and Technical Specification 5.5.2.7 Ventilation Filter Testing Program (VFTP), if more than 90 hours of operation per year (excluding tests) for either train is anticipated by plant operations based on the operating experience. This requirement is contained in the Technical Requirements Manual VFTP and its associated procedures.