PMSTPCOL PEmails

From: Joseph, Stacy
Sent: Wednesday, July 08, 2009 11:22 AM
To: 'Cashell, George S'
Cc: STPCOL
Subject: DRAFT RAIs 3041, 3042, 3081 and 3097
Attachments: RAI 3097.doc; RAI 3081.doc; RAI 3042.doc; RAI 3041.doc

Steve,

Please review attached DRAFT RAIs 3041, 3042 and 3081 related to SRP Section 16 and RAI 3097 related to SRP Section 14.2. RAI 3097 is very similar to RAI 2898 except that reference is in 14.2.12.2 instead of 14.2.12.1. Please let me know if you require a telecon to ensure your understanding of these RAIs is clear.

Thank you,
Stacy

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Hearing Identifier: SouthTexas34Public_EX
Email Number: 1429

Mail Envelope Properties (CEEA97CC21430049B821E684512F6E5ECA520C3C47)

Subject: DRAFT RAIs 3041, 3042, 3081 and 3097
Sent Date: 7/8/2009 11:22:23 AM
Received Date: 7/8/2009 11:22:25 AM
From: Joseph, Stacy

Created By: Stacy.Joseph@nrc.gov

Recipients:
"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
"'Cashell, George S'" <gscashell@STPEGS.COM>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	630	7/8/2009 11:22:25 AM
RAI 3097.doc	31226	
RAI 3081.doc	31738	
RAI 3042.doc	30714	
RAI 3041.doc	30202	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Request for Additional Information No. 3097 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants
Application Section: 14.2.12.2.12

QUESTIONS for Engineering Mechanics Branch 1 (AP1000/EPR Projects) (EMB1)

14.02-***

The COL applicant supplemented FSAR Subsection 14.2.12.2. 12 by deleting NEDO 33316, “Advanced Boiling Water Reactor (ABWR) Vibration Assessment Program in compliance with RG 1.20,” and replacing it with a reference to Subsections 3.9.2.3, 3.9.2.4 and 3.9.2.6 in the STP Units 3&4 FSAR. The information in STP Unit 3&4 FSAR Subsections 3.9.2.3, 3.9.2.4 and 3.9.2.6 is not sufficient to provide reasonable assurance that startup testing for Reactor Internal Vibration will satisfy the NRC regulations. For example, Criterion XI of Appendix B to 10 CFR Part 50 requires, in part, that a test program be established to ensure that all testing required to demonstrate that structures, systems, and components (SSCs) will perform satisfactorily in service is identified and performed in accordance with written test procedures that incorporate the requirements and acceptance limits in applicable design documents. The test program should include, as appropriate, operational tests during plant operation of SSCs. Test procedures should include provisions for ensuring that all prerequisites for the given test have been met, adequate test instrumentation is available and used, and the test is performed under suitable environmental conditions. Test results should be documented and evaluated to ensure that test requirements have been satisfied. The staff requests a comprehensive startup test program be submitted to the NRC for review.

Request for Additional Information No. 3081 Revision 0

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 16 - Technical Specifications
Application Section: TS Section 3.8 Electrical

QUESTIONS for Technical Specification Branch (CTSB)

16-***

Provide justification for increasing the time period specified for the CTG to start and achieve steady state voltage and frequency from within 2 minutes to less than 10 minutes, in STD DEP 8.3-1. Also discuss the reasons for the 10 minute criterion on CTG functionality in the bases for the ACTIONS of PTS 3.8.1, and also PTS 3.5.1, 3.8.4, 3.8.9, and 3.8.11, which have the same action requirement for verifying CTG functionality.

Background:
The ABWR DCD section 3.8.1 Technical Specifications state for this CONDITION, the REQUIRED ACTION is, "Verify the CTG is functional by verifying the CTG starts and achieves steady state voltage and frequency in less than 2 minutes."
The analogous STP Technical Specification for this CONDITION and REQUIRED ACTION is, "Verify the CTG is functional by verifying the CTG starts and achieves steady state voltage and frequency in less than 10 minutes."
This change is identified in STP 3&4 STD DEP 8.3-1. Section 9.5.11 Combustion Turbine/Generator (CTG) of the STP 3&4 FSAR describes the CTG as automatically starting, coming up to speed, reaching nominal voltage and frequency, and accepting load within 10 minutes of receipt of its start signal, and that the reconfiguration necessary to shed plant investment protection (PIP) loads for emergency shutdown loads can be accomplished from the main control room within 10 minutes of the onset of the start of a station blackout. It further states that this meets the requirements of Regulatory Guide 1.155 and 10 CFR 50.63 such that a station blackout coping analysis is not required. While this change description does meet the requirements for Regulatory Guide 1.155 and 10 CFR 50.63 so that a station blackout coping analysis is not required, this is not a justification for the change. A demonstration of the ability of a plant to connect its alternate AC power source to the safety buses when the plant is in a degraded state (inoperable equipment) is not discussed in Reg. Guide 1.155 or 10 CFR 50.63 and is not applicable to the technical specifications. STP should commit to performing this verification prior to fuel load and not under adverse conditions.

Request for Additional Information No. 3042 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 16 - Technical Specifications
Application Section: 3.1

QUESTIONS for Technical Specification Branch (CTSB)

16-***

Correct the following editorials contained in Section 3.1 of the Technical Specifications:

1. Page B3.1.1-5 is misnumbered as B3.1.7-5.

2. On the above mentioned page, which should be page 3.1.1-5, replace "ot" with "to" in line 10 of the last paragraph.

3. On page B3.1.3-6, in lines 1 and 2 of paragraph entitled "E.1", replace "Condition A, C, D or E" with "Condition A, C or D" to ensure that the bases are in agreement with the statement of Condition E of PTS 3.1.3 on page 3.1.3-3.

4. On page B3.1.3-6, in line 4 of the paragraph entitled "D.1 and D.2", there is an open parenthesis before the word "which", with no corresponding closed parenthesis anywhere in the paragraph.

5. On page B3.1.6-1, in the first line of the last paragraph, replace "Reference 1 and 2" with "References 1 and 2".

6. On page B3.1.6-3, in the third line of the third paragraph, there is no space between the words "mode" and "switch". Replace "modeswitch" with "mode switch".

7. On page B3.1.7-4, in the last line of the first paragraph, the word "ACTIONS" has been inserted in error. Replace "low probability of ACTIONS an ATWS event." with "low probability of an ATWS event."

Request for Additional Information No. 3041 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 16 - Technical Specifications
Application Section: 3.4.3 RCS Operational Leakage

QUESTIONS for Technical Specification Branch (CTSB)

16-***

Provide justification for the values in Plant Technical Specifications (PTS) Limiting Condition for Operation (LCO) 3.4.3 b, c, and d. In the ABWR Generic Technical Specifications (GTS), LCO 3.4.3 b and c limit the RCS operational leakage to 3.785 L/min and 98.4 L/min, respectively. In the PTS, LCO 3.4.3 b and c limit the RCS operational leakage to 19 L/min and 114 L/min, respectively. PTS LCO 3.4.3 d limits the unidentified leakage rate within the previous 4 hours to 8 L/min. Provide justification for these less conservative values.