

PMSTPCOL PEmails

From: Joseph, Stacy
Sent: Tuesday, July 28, 2009 12:24 PM
To: 'Cashell, George S'; Govan, Tekia
Cc: STPCOL
Subject: RAI Letter 164
Attachments: ML0920805575.pdf

Steve,

Please see attached RAI Letter No. 164 related to SRP Section 16. A hard copy of this letter will follow shortly. This letter has been made publically available in ADAMS.

Sincerely,
Stacy Joseph
NRO/DNRL
Project Manager
301-415-2849

Hearing Identifier: SouthTexas34Public_EX
Email Number: 1516

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Subject: RAI Letter 164
Sent Date: 7/28/2009 12:24:15 PM
Received Date: 7/28/2009 12:24:24 PM
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
"Govan, Tekia" <Tekia.Govan@nrc.gov>
Tracking Status: None

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MESSAGE	276	7/28/2009 12:24:24 PM
ML0920805575.pdf	100109	

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Priority: Standard
Return Notification: No
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July 28, 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. 164 RELATED TO
SRP SECTION 16 FOR THE SOUTH TEXAS PROJECT COMBINED LICENSE
APPLICATION

Dear Mr. Head

By letter dated September 20, 2007, STP Nuclear Operating Company (STP) 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.

If you have any questions or comments concerning this matter, I can be reached at 301-415-2849 or by e-mail at Stacy.Joseph@nrc.gov or you may contact George Wunder at 301-415-1494 or George.Wunder@nrc.gov.

Sincerely,

/RA T. Govan for:/

Stacy Joseph, Project Manager
ESBWR/ABWR Projects Branch 2
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-012
52-013

eRAI Tracking Nos. 3045, 3046, 3047, 3071, 3072, 3073 and 3076

Enclosures:
Request for Additional Information

cc:
Mr. William Mookhoek
Mr. G. Steve Cashell

If you have any questions or comments concerning this matter, I can be reached at 301-415-2849 or by e-mail at Stacy.Joseph@nrc.gov or you may contact George Wunder at 301-415-1494 or George.Wunder@nrc.gov.

Sincerely,

/RA T. Govan for:/

Stacy Joseph, Project Manager
ESBWR/ABWR Projects Branch 2
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-012

52-013

eRAI Tracking Nos. 3045, 3046, 3047, 3071, 3072, 3073 and 3076

Enclosures:

Request for Additional Information

cc:

Mr. William Mookhoek

Mr. G. Steve Cashell

Distribution:

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ADAMS Accession No. ML092080557

NRO-002

OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3045)	NAshkeboussi	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/16/2009	7/15/2009	7/23/2009
OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3046)	NAshkeboussi	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/18/2009	7/21/2009	7/23/2009
OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3047)	NAshkeboussi	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/16/2009	7/15/2009	7/23/2009
OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3071)	DScully	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/16/2009	7/15/2009	7/23/2009
OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3072)	DScully	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/16/2009	7/15/2009	7/23/2009
OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3073)	DScully	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/16/2009	7/15/2009	7/23/2009
OFFICE	CTSB/TR	CTSB/BC	NGE2/PM	OGC	NGE2/L-PM
NAME (3076)	DScully	MKowal	SJoseph	SKirkwood	GWunder
DATE	6/8/2009	6/12/2009	6/16/2009	7/15/2009	7/23/2009

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information No. 3045 Revision 0

7/23/2009

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: 3.7 Plant Systems

QUESTIONS for Technical Specification Branch (CTSB)

16-8

Provide a standard departure report for the addition of SR 3.7.1.4. Proposed changes to the technical specifications require NRC approval. SR 3.7.1.4, Operate each cooling tower cell fan for greater than or equal to 15 minutes once per 31 days, is not a part of the GTS and requires justification for inclusion in the PTS. Provide the justification for SR 3.7.1.4.

This question also applies to PTS SR 3.7.2.4 and SR 3.7.3.4.

16-9

Revise SR 3.7.1.2 to verify the water level in the RSW pump well. Currently, PTS SR 3.7.1.1 and SR 3.7.1.2 require verification of the water level in the UHS basin. PTS SR 3.7.1.2 should correspond to GTS SR 3.7.1.2, requiring verification of the water level in the RSW pump well. Revise PTS SR 3.7.1.2 to require verification of RSW pump well water level.

16-10

The applicant is requested to justify, in a STD DEP, replacing GTS SR 3.7.2.2, to verify the water level in the RSW pump well, with PTS SR 3.7.2.2, to verify the water level in the UHS basin.

16-11

The applicant is requested to justify, in a STD DEP, replacing GTS SR 3.7.3.2, to verify the water level in the RSW pump well, with PTS SR 3.7.3.2, to verify the water level in the UHS basin.

16-12

The applicant is requested to justify, in a STD DEP, revising GTS 3.7.7 Required Action B.1 by replacing "<" with "<=" in PTS 3.7.7 Required Action B.1. PTS 3.7.7 Action B.1 states that thermal power should be reduced to <= 40% RTP. GTS Required Action B.1 states that thermal power should be reduced to < 40% RTP.

Request for Additional Information No. 3046 Revision 2

7/23/2009

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: 5.0 Administrative Controls

QUESTIONS for Technical Specification Branch (CTSB)

16-13

Revise Section 5.2.2.d to address the final rule amending 10 CFR Part 26. Section 5.2.2.d contains the requirements on working hours for personnel who perform safety related functions. TSTF-511, Rev. 0 was issued to address the change in requirements in 10 CFR Part 26. Specifically, the traveler proposes to eliminate Section 5.2.2.d. Revise Section 5.2.2.d to address TSTF-511, Rev. 0.

16-14

Change reference in PTS 5.5.2.8.b from "DCD Tier 2, Section 15.7.1" to "FSAR Tier 2, Section 15.7.1." This is one example of a global comment for DCD Tier 2 references in the PTS bases, and in some places, in the PTS, such as in this case. The PTS and bases are derived from (1) the ABWR generic DCD plus any departures, and (2) site-specific information. Together, these are the FSAR for the COL.

16-15

The applicant is requested to update plant-specific technical specification (PTS) 5.5.2.6, "Inservice Testing Program," to current regulatory requirements. PTS 5.5.2.6, "Inservice Testing Program," in Section 5.0, "Administrative Controls," of the STP Units 3 & 4 (STP 3&4) COL application Part 4, "Technical Specifications," states that the Inservice Testing (IST) Program references Section XI of the ASME Boiler & Pressure Vessel Code (BPV Code) and applicable Addenda for testing frequencies and other aspects of the IST Program. The IST Program is categorized as an operational program per the guidance in Commission Paper SECY-05-0197 and Regulatory Guide 1.206. Based on this guidance, a COL Applicant is expected to provide a full description of operational programs for NRC review in support of its COL application. The current NRC regulations in 10 CFR 50.55a incorporate by reference the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) with certain modifications to supersede Section XI of the ASME BPV Code for the development of IST Programs for new nuclear power plants and as operating plants update their IST Programs in accordance with the regulations. Further, NUREG-1434, "Standard Technical Specifications for General Electric Plants, BWR/6," Revision 3.1, dated December 1, 2005, specify the use of the ASME OM Code for development of the IST Programs for these plants. The NRC staff requests that the STP 3&4 COL applicant update PTS 5.5.2.6 in Part 4, and in Chapter 16 of Part 2, "Final Safety Analysis Report," of the STP 3&4 COL application, to reference the ASME OM Code consistent with the full description of the IST Program to be reviewed by the NRC staff

using the guidance in NRC Standard Review Plan Section 3.9.6, "Functional Design, Qualification, and Inservice Testing Programs for Pumps, Valves, and Dynamic Restraints." PTS 5.5.2.6 should also note that the NRC regulations in 10 CFR 50.55a specify modifications to the IST provisions in the ASME OM Code that need to be addressed as part of the IST Program for STP 3&4. For example, the NRC regulations in 10 CFR 50.55a(b)(3)(ii) require the establishment of a program to ensure that motor-operated valves continue to be capable of performing their design-basis safety functions. In accordance with the ABWR design certification rule and 10 CFR 52.7, the applicant is also requested to describe and justify the update to PTS 5.5.2.6 in an associated standard departure from the ABWR generic TS (GTS) in Part 7, "Departures Report." of the STP 3&4 COL application. In addition, the applicant is requested to add a markup of the affected GTS pages in Chapter 16 of Part 2 of the STP 3&4 COL application.

Request for Additional Information No. 3047 Revision 0

7/23/2009

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: 3.9 Refueling Operations

QUESTIONS for Technical Specification Branch (CTSB)

16-16

In the LCO section of the bases for PTS 3.9.5 on Page B 3.9.5-2, replace the greater than symbol with the greater than or equal to symbol for consistency with the condition for the minimum scram accumulator pressure in other parts of the PTS. This GTS bases deviation must be addressed in a standard departure, such as STD DEP 16.3-15.

Request for Additional Information No. 3071 Revision 0

7/23/2009

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: 2.0

QUESTIONS for Technical Specification Branch (CTSB)

16-17

Correct the following editorials contained in Section 2.0 of the Technical Specifications:

1. On page B2.1.1-3, the first and second paragraphs need to be separated by a line in accordance with the Technical Specifications Writer's Guide.
2. On page B2.1.2-2, there is no period at the end of Reference 2.

Request for Additional Information No. 3072 Revision 0

7/23/2009

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

QUESTIONS for Technical Specification Branch (CTSB)

16-18

Correct the following editorials contained in Section 3.4 of the Technical Specifications (Note that #10 below also regards Section 3.9):

1. In bases 3.4.1, the last line of the LCO section lists Reference 1. This should list Reference 3.
2. Revise the Completion Time for Required Action A.1 of PTS 3.4.2 from "14 day" to "14 days" on page 3.4.2-1.
3. Replace the description of Required Action B.1 of PTS 3.4.3, on page 3.4.3-1, to "Reduce LEAKAGE increase to within limits." Condition B is that the unidentified LEAKAGE increase is not within limit. The Required Action to reduce the LEAKAGE to within limits does not necessarily address this Condition, since the unidentified LEAKAGE can still be within its limit of 19 L/min when the LEAKAGE increase is greater than its limit of 8 L/min. The bases for Actions B.1 and B.2 defines the Action as reducing the LEAKAGE increase to within limits, and this change is needed to make the Required Action consistent with the bases for the Required Action.
4. Revise the second paragraph of bases 3.4.4, Applicable Safety Analyses to have "RCS PIV leakage satisfies Criterion 2 of the NRC Policy Statement." as its' own paragraph for consistency with the format used in other sections of the bases.
5. Replace "LCO Note" with "LCO Note 1" in the second line of the first paragraph of the bases for Required Actions B.1, B.2 and B.3 of PTS 3.4.7, on page B 3.4.7-4.
6. Replace "LCO Note" with "LCO Note 1" in the second line of the first paragraph of the bases for Required Actions B.1 and B.2 of PTS 3.4.7, on page B 3.4.8-3.
7. Align the page header "3.4 REACTOR COOLANT SYSTEM (RCS)" with the left margin of page 3.4.9-1 of PTS 3.4.9.
8. Replace "3.4.9" with "3.4.8" in the discussion of STD DEP 16.3-9, LCO 3.4.7, Alternate Decay Heat Removal, on page 2.2-53 of Section 2.2.3 of Part 7 of the COL application.
9. At the top of page 3.4.9-1, correct the alignment of "3.4 Reactor Coolant System (RCS)" in Section 3.4.9.

10. The applicant is requested to revise the Applicable Safety Analyses section of the bases for PTS 3.4.7, 3.4.8, 3.9.7, and 3.9.8 to include the appropriate 10 CFR 50.36 criteria for LCO inclusion in technical specifications. In the Applicable Safety Analyses of the PTS bases sections listed above, each section has the following similar statement: although the system does not meet a specific criterion of the NRC Policy Statement, it was identified in the NRC Policy Statement as an important contributor to risk reduction. Criterion 4 of 10 CFR 50.36(c)(2)(ii) states that an SSC which operating experience or PRA has shown to be significant to public health and safety must be included in the technical specifications. Additionally, in the STS the corresponding bases sections appropriately include the reference to Criterion 4. Revise the bases sections listed above to appropriately reflect the applicable technical specification criteria.

Request for Additional Information No. 3073 Revision 0

7/23/2009

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: 3.10

QUESTIONS for Technical Specification Branch (CTSB)

16-19

Correct the following editorial contained in Section 3.10 of the Technical Specifications:

1. On page 3.10.1-1, line a. under LCO 3.10.1 has a closed bracket (]) at the end of the line with no corresponding open bracket anywhere preceding in the line.

Request for Additional Information No. 3076 Revision 0

7/23/2009

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: 3.8

QUESTIONS for Technical Specification Branch (CTSB)

16-20

Correct the following editorials contained in Section 3.8 of the Technical Specifications:

Section 3.8.1

1. The applicant is requested to add GTS 3.8.1 ACTION D to PTS 3.8.1 ACTIONS. GTS 3.8.1 ACTION D, for the condition of two required offsite circuits inoperable, appears to have been inadvertently omitted from PTS 3.8.1 ACTIONS, since it is included in the bases ACTIONS section for PTS 3.8.1.

Section 3.8.2

1. PTS 3.8.2 Required Action A.1 should be Required Action A.1.1 to match the GTS 3.8.2 Required Action A.1.1.
2. The conjunction "or" should be removed, and the subsequent phrase should phrase begin on its own line, in alignment with the first line of the applicability of PTS 3.8.2, in order to conform to the STS writer's guide for applicability statements. This correction will require a STD DEP in COLA Part 7.

Section 3.8.9

1. Place line separators between the BACKGROUND and APPLICABLE SAFETY ANALYSES bases sections and between the APPLICABLE SAFETY ANALYSES and LCO bases sections for PTS 3.8.9.
2. Revise the PTS 3.8.9 bases LCO section on page B 3.8.9-3 to be consistent with the language in the corresponding GTS 3.8.9 bases LCO section; specifically, the following sentence does not make sense: "Maintaining the three Divisions of AC and the four Divisions of DC and AC vital bus electrical power distribution subsystems OPERABLE ensures that the redundancy incorporated in the design of the ESF systems Bypass System inoperable, modifications to the MCPR limits (LCO 3.2.2), is not defeated." It should read consistent with the GTS 3.8.9 bases page B.3.8.9, LCO Section, second paragraph, first line, which states, "Maintaining the three Divisions of AC and the four Divisions of DC and AC vital bus electrical power distribution subsystems OPERABLE ensures that the redundancy incorporated in the design of the ESF systems is not defeated."

3. On PTS 3.8.9 bases page B 3.8.9-3, in the LCO section, between the first and second paragraph on the page, there is an extra line break that should be removed.