Nuclear Operating Company

South Texas Project Electric Generating Station 4000 Avenue F – Suite A Bay City, Texas 77414

September 21, 2009
U7-C-STP-NRC-090151

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Response to Request for Additional Information

Attached are the responses to the NRC staff questions included in Request for Additional Information (RAI) letter number 219 related to Combined License Application (COLA) Part 2, Tier 2, Section 4.5.1. This submittal completes the response to this RAI letter.

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

RAI 04.05.01-1
RAI 04.05.01-2

When a change to the COLA is indicated, it will be incorporated in the next routine revision of the COLA following the NRC acceptance of the RAI response.

There are no commitments in this letter.

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

STI 32536116

D091
NRO

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

Executed on 9/21/09

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

jep

Attachments:
1. RAI 04.05.01-1
2. RAI 04.05.01-2

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

Director, Office of New Reactors
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Kathy C. Perkins, RN, MBA
Assistant Commissioner
Division for Regulatory Services
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

Alice Hamilton Rogers, P.E.
Inspections Unit Manager
Texas Department of State Health Services
P.O. Box 149347
Austin, TX 87814-9347

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

*Steven P. Frantz, Esquire
A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave. NW
Washington D.C. 20004

*George F. Wunder
*Tekia Govan
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

(electronic copy)

*George F. Wunder
*Tekia Govan
Loren R. Plisco
U. S. Nuclear Regulatory Commission

Steve Winn
Eddy Daniels
Joseph Kiwak
Nuclear Innovation North America

Jon C. Wood, Esquire
Cox Smith Matthews

J. J. Nesrsta
R. K. Temple
Kevin Pollo
L. D. Blaylock
CPS Energy

RAI 04.05.01-1

QUESTION:

Modifications made, as part of STD DEP 4.5-1, in COL FSAR Section 4.5.1.4, are not described in the applicant's departures report. The staff requests that the applicant modify its departures report to include a summary of the modifications made in COL FSAR Section 4.5.1.4. in order to comply with the requirements of 10 CFR 52, Appendix A, Section X.B.1.

RESPONSE:

There are two changes in this section - deletion of the words "GE Engineering" and replacement of ANSI N45.2.2 with NQA-1 Part II Section 2.2. The first change is addressed in the response to RAI 04.05.02-4 (see letter U7-C-STP-NRC-090063 dated June 25, 2009).

The latter change reflects the fact that ANSI N45.2.2 has been withdrawn and is now included as Part II Section 2.2 of ANSI/ASME NQA-1. COLA Part 7, Section 3.0 will be revised to add this change to the departure description as shown below.

STD DEP 4.5-1, Reactor Materials

Description

A summary of the changes to the DCD is as follows:

(10) Section 4.5.1.4 is revised to clarify that the requirements of ANSI N45.2.2 are now included as part of NQA-1.

RAI 04.05.01-2

QUESTION:

The applicant provided additional information, in COL FSAR Section 4.5.3.1, to address COL Item number 4.4. While the nozzle and bolting inspection requirements are specified in ASME Code Section XI and will be performed as required by 10 CFR50.55a, it is unclear to the staff what the remainder of the applicant's CRD inspection program entails, such as what internal components will be examined and the acceptance criteria for those inspections. Therefore the staff requests that the applicant modify FSAR Section 4.5.3.1 to include a more detailed description of its CRD inspection program.

RESPONSE:

As stated in COLA Part 2, Tier 2, Section 4.5.3.1, the routine visual inspection of the CRDs will be included in the preventive maintenance program. As described in COLA Part 2, Tier 2, Section 13.5.3.3.2, maintenance procedures will be issued six months prior to commencement of the Preoperational Test Program.

Current operating ABWRs perform visual inspections of each CRD motor and spool piece every 10 years. The visual inspection looks for damage, such as scratches, deformation, or other damage and checks for movement of components. If any scratches, deformation or other damage are found, then an engineering evaluation is performed to determine if the damage will have an impact on the CRD function. If it is determined that the damage could have an impact on the function, then the component is repaired. Otherwise the component will be used as is.

It is expected that the CRD internal components will require no maintenance. Specifically, the CRD internal components of operating ABWRs have been inspected on a sampling basis for reference. The internal components inspected included the ball spindle, buffer mechanism, hollow piston, guide tube, roller retainer, and outer tube assembly. These inspections have shown no damage to any of these components and confirmed that routine periodic inspections would not be required. Therefore, STPNOC does not plan on performing routine periodic inspections of the CRD main body internal components.

No COLA change is required as a result of this RAI response.