

October 5, 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. 276 RELATED TO  
SRP SECTION 8.4 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.

S. Head

-2-

If you have any questions or comments concerning this matter, I can be reached at 301-415-4093 or by e-mail at [Adrian.Muniz@nrc.gov](mailto:Adrian.Muniz@nrc.gov) or you may contact George Wunder at 301-415-1494 or [George.Wunder@nrc.gov](mailto:George.Wunder@nrc.gov).

Sincerely,

**/RA/**

Adrian Muñiz, Project Manager  
ABWR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-012  
52-013

eRAI Tracking No. 3632

Enclosure:  
Request for Additional Information

cc: William Mookhoek  
Richard Bense

S. Head

-2-

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NAME	BBhatia	RJenkins	AMuñiz	GWunder
DATE	8/26/09	9/2/09	10/05/09	9/22/09

**\*Approval captured electronically in the electronic RAI system.**

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## Request for Additional Information No. 3632 Revision 2

### South Texas Project Units 3 and 4 South Texas Project Nuclear Operating Co Docket No. 52-012 and 52-013 SRP Section: 08.04 - Station Blackout Application Section: 08.04

QUESTIONS for Electrical Engineering Branch (EEB)

#### 08.04-3

In RAI 08.04-2, the staff requested that the applicant address station blackout-related procedures. The applicant provided adequate response pertaining to Station Blackout (SBO) Response Guidelines and AC Power Restoration. Regarding Severe Weather Guidelines the applicant stated that, "in the June 16, 1989 letter from T.E. Murley, USNRC to W. H. Rasin, Nuclear Management and Resources Council (Included in Appendix K to NUMARC 87-00), it is stated that not all plants are required to have procedures which require shutdown two hours prior to hurricane (i.e., Severe Weather Guidelines) to address Station Blackout. Since the ABWR has an Alternate AC supply available within 10 minutes of the Station Blackout, there is no specific requirement for Severe Weather Guidelines to be included as a Station Blackout response procedure."

As indicated in the original request for additional information, NUMARC 87-00, endorsed by Regulatory Guide 1.155 and referenced by SRP 8.4, states that the SBO response procedures include (1) Station Blackout Response Guidelines, (2) AC Power Restoration, and (3) Severe Weather Guidelines. These Guidelines are discussed in section 4.2 of the NUMARC document. NUMARC also states that the actions contained within these guidelines "are important considerations during a station blackout" and that "Utilities should assure [that] these considerations are addressed." Therefore, the staff does not agree with the applicant position that, because the ABWR has an alternate AC supply available within 10 minutes, there is no specific requirement for Severe Weather Guidelines to be included as a Station Blackout response procedure.

Regarding the T. E. Murley's statement pertaining to plant shutdown in anticipation of a hurricane, applicants are required to evaluate specific plant conditions as provided for in NUMARC 87-00, not on the basis of whether or not an AAC source is available. The staff agrees that not all plants are required to have procedures to shutdown the plant two hours before a hurricane. However those plants are required to have a severe weather procedure per NUMARC 87-00, Section 4.2.3. The shutdown requirement constitutes only one action (action (4) (a)) of the severe weather guidelines (Section 4.2.3). Regarding this issue, the staff reviewed the STP, Units 1 and 2, FSAR and observed that the design of Units 1 and 2, like the proposed design of Units 3 and 4, includes an AAC source that can be made available in 10 minutes. The staff also observed that, for Units 1 and 2, STP has provisions for shutting down in anticipation of a hurricane, albeit the STP procedures also include provisions for deviating from the NUMARC guidance when the shutdown could increase the likelihood of a loss of offsite power. In addition, the staff found that in STP Units 3 and 4 FSAR, Appendix 19Q, (page 19Q-4), the STPNOC has committed (COM 19Q-1) to develop a procedure to cope with and to reduce the risk in responding to an approaching hurricane.

Based on the above, confirm that severe weather procedures in accordance with NUMARC document 87-00 will be developed. Otherwise, provide technical justification for not requiring a severe weather procedure.