

## PMSTPCOL PEmails

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**From:** Joseph, Stacy  
**Sent:** Friday, December 11, 2009 11:22 AM  
**To:** 'Cashell, George S'  
**Cc:** STPCOL  
**Subject:** DRAFT RAIs Related to Chapter 16  
**Attachments:** RAI 4084.doc; RAI 4098.doc

Steve,

Attached is are two draft RAIs related to Chapter 16. Please let me know by FRI, DEC 18 if you require a telecon for clarification of the RAIs. If I do not hear from you by COB next Friday, I will assume your understanding is clear and I will issue the RAIs.

These are the last two RAIs that I will be sending in the foreseeable future related to Chapter 16.

Thank you,  
Stacy

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**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 1906

**Mail Envelope Properties** (BBC4D3C29CD0E64E9FD6CE1AF26D84D51FA5489502)

**Subject:** DRAFT RAIs Related to Chapter 16  
**Sent Date:** 12/11/2009 11:22:23 AM  
**Received Date:** 12/11/2009 11:22:26 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

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	757	12/11/2009 11:22:26 AM
RAI 4084.doc	30714	
RAI 4098.doc	33274	

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

Request for Additional Information No. 4084 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: 16.3.3.4.2

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

(This is a follow-on to RAI 16-21 Issue Number 4) The applicant completes GTS SR 3.3.4.2.2 and bases by replacing the bracketed Frequency of “[92] days” with “31 days.” This SR requires performing a Channel Functional Test for Feedwater Pump and Main Turbine Trip Instrumentation. The bases for GTS SR 3.3.4.2.2 state that the [92]-day Frequency is based on “the system capability to automatically perform self-tests and diagnostics.” In general, ABWR GTS and PTS SR Frequencies should be based on more than “the system capability to automatically perform self-tests and diagnostics.” The applicant is requested to identify all instances in Revision 3 of the PTS bases for which this is the sole rationale for the acceptability of a SR Frequency, and propose additional justification, consistent with the STS (NUREG-1433 and NUREG-1434) and/or other appropriate justifications contained in the GTS bases. Changes proposed in response to this question should be addressed in a new standard departure from the GTS bases.

Request for Additional Information No. 4098 Revision 3

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: 16.4.1

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

GTS 4.1.1 states, "The site and exclusion area boundaries [shall be as described or as shown in Figure 4.1-1]."

GTS 4.1.2 states, "The Low Population Zone (LPZ) [shall be as described or as shown in Figure 4.1-2]."

In its response to RAI 16-21, SER Table 16.1 COL Items 126 and 127, the applicant proposed to complete the bracketed site-specific information in GTS 4.1.1 and GTS 4.1.2 by referencing FSAR Figure 2.1S-3.

The NRC staff's position is that the above bracketed phrases require the COL applicant to either provide a description or a figure for these items in the PTS. Referencing the FSAR Figure that depicts these items is not acceptable because it will allow the licensee to change these items without prior NRC staff approval, and is inconsistent with both the STS (NUREG-1434) and the Technical Specifications for STP Units 1 and 2.

The reviewer's note in GTS Section 4.0 for Figure 4.1-1, "Site and Exclusion Area Boundaries," states:

- (This figure shall be supplied by the COL applicant.) This figure shall consist of [a map of] the site area and provide, as a minimum, the information described in Section [ 2.1.2 ] of the FSAR relating to [the map].

The reviewer's note in GTS Section 4.0 for Figure 4.1-2, "LPZ," states:

- (This figure shall be supplied by the COL applicant.) This figure shall consist of [a map of] the site area showing the LPZ boundary. Features such as towns, roads, and recreational areas shall be indicated in sufficient detail to allow identification of significant shifts in population distribution within the LPZ.

These notes also support the above NRC staff position that plant-specific TS must either contain descriptions or drawings of the Site and Exclusion Area Boundaries, and the LPZ. Therefore, the applicant is requested to provide in PTS Section 4.0 the site-specific descriptions of the Site and Exclusion Area Boundaries, and the LPZ; or provide Figures meeting the criteria stated in the generic TS reviewer's notes.

