



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

January 7, 2010
U7-C-STP-NRC-100008

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

Reference: Letter, Scott Head to Document Control Desk, "Response to Requests for Additional Information", dated October 29, 2009, U7-C-STP-NRC-090189, (ML093090633)

This letter provides a revised response to Request for Additional Information (RAI) Question 11.05-7, related to COLA Part 2, Tier 2, Section 11.5, "Process and Effluent Radiological Monitoring and Sampling Systems", originally supplied as Attachment 4 of the referenced letter.

The indicated change to the COLA will be included in the next routine revision of the COLA submitted after NRC acceptance of the RAI response.

There are no commitments in this letter.

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

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

Executed on 1/7/10

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

SCS

Attachment:
Question 11.05-7 Revised Response

STI 32596422

DO91
NRO

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

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RAI 11.05-7**QUESTION**

In FSAR Section 11.5.5.2, Calibration, STD DEP 11.5-1, under 11.5.5 Calibration and Maintenance, the sentence stating, "Each continuous monitor is calibrated during plant shutdown or during the refueling outage if the detector is not accessible during power operation." has been changed from the DCD.

In order to follow normal calibration procedures for continuous effluent monitors of this type, the word "shutdown" should be changed back to "operation" so that if the monitor is not able to be calibrated on its normal required frequency of "R" or every 18 months, due to the length of the fuel cycle, or the monitor's accessibility, it can be calibrated during the refueling outage to be able to meet the calibration requirement in the Offsite Dose Calculation Manual (ODCM).

REVISED RESPONSE:

This response revises the previous response to this question, submitted on October 29, 2009, in letter U7-C-STP-NRC-090189. The following change to the COLA will be made as a result of this revised response.

11.5.5.2 Calibration

STD DEP 11.5-1

Calibration of radiation monitors is performed using certified commercial radionuclide sources traceable to the National Institute of Standards and Technology. ~~The overall reproducibility of calibration is limited to $\pm 15\%$. The source-detector geometry during primary calibration will be mechanically precise enough to ensure that positioning errors of either instruments or radiation sources do not affect the calibration accuracy by more than $\pm 3\%$. Each continuous monitor is calibrated during plant operation shutdown or during the refueling outage if the detector is not readily accessible during power operation. Calibration can also be performed on the applicable instrument by using liquid or gaseous radionuclide standards or by. Periodic In-service calibrations are performed through appropriate methods including analyzing particulate iodine or gaseous grab samples with laboratory instruments. in accordance with approved plant procedures, and consist of verifying monitor response, indication and operation within acceptable tolerances.~~