



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

January 18, 2010
U7-C-STP-NRC-100013

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 is the response to the NRC staff question included in Request for Additional Information (RAI) letter number 306 related to Combined License Application (COLA) Part 2, Tier 2, Section 5.02.

The attachment completes the response to the RAI question listed below:

05.02.01.02-5

The COLA change documented in the attachment will be incorporated in the next routine revision of the COLA following NRC acceptance of the RAI response.

There are no commitments in this letter.

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

STI 32598965

DO91
NRO

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

Executed on 1/18/2010



Mark McBurnett
Vice President, Oversight & Regulatory Affairs
South Texas Project Units 3 & 4

rhs

Attachment:

Question 05.02.01.02-5

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

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RAI 05.02.01.02-5**QUESTION:**

In the applicant's response to RAI 05.01.02.01-4, the applicant stated that Code Cases N-71-15 and N-319 are listed in ABWR DCD Tier 2, Table 5.2-1, as applicable to equipment in systems within the scope of the DCD. STP FSAR Tier 2, Table 5.2-1 also lists Code Cases N-71-18 and N-319-3. As part of STD DEP 1.8-1, the applicant has modified Section 1.8 of the ABWR DCD to state that STP 3 & 4 FSAR conforms to RG 1.84, Revision 33. The staff notes that requirements related to the implementation of code cases are provided in 10 CFR 50.55a(b). RG 1.84 states that when a licensee initially applies a code case listed in Table 1 (acceptable Section III code cases) or 2 (conditionally acceptable code cases), the licensee must implement the most recent version of that Code Case incorporated by reference in 10 CFR 50.55a. The staff therefore finds the applicant's use of superseded code cases unacceptable because the applicant has stated that it conforms to RG 1.84 Revision 33 in which Code Cases N-71-15 and N-319 have been superseded. The staff requests that the applicant delete superseded code cases from Table 5.2-1 and list only the most recent revisions of code case listed in RG 1.84, Revision 33.

RESPONSE:

By letter U7-C-STP-NRC-090159, dated September 24, 2009, STPNOC provided the response to RAI 05.02.01.02-4; and as noted in the response to item a), STP 3&4 FSAR Table 5.2-1 will be revised, replacing Code Case N-71-17 with Code Case N-71-18. Also, included in the "Remarks" column, will be a qualifying word, "Conditionally". Furthermore, FSAR Table 5.2-1 will be revised to delete Code Cases N-71-15 and N-319, which are listed in ABWR DCD Tier 2, Table 5.2-1. This response supersedes the answer to item d) in the initial response. Because the deleted Code Cases are designated as Tier 2* in ABWR DCD, Tier 2, Table 5.2-1, the replacement Code Cases are marked as Tier 2* in FSAR Table 5.2-1.

COLA Revision 3, FSAR Table 5.2-1, Reactor Coolant Pressure Boundary Components Applicable Code Cases, will be updated with the changes as shown below. Changes from COLA Rev. 3 are identified in gray shading. This markup replaces the markup provided in the response to RAI 05.02.01.02-4, referenced above.

**Table 5.2-1 Reactor Coolant Pressure Boundary Components
Applicable Code Cases**

Number	Title	Applicable Equipment	Remarks
[N-71-15]	(1)	Component Support]*	Accepted per RG 1.85 1.84
[N-71-178]	(1)	Component Support]*	Conditionally Accepted per RG 1.84
[N-319]	(9)	Piping]*	Accepted per RG 1.84