



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

February 11, 2010
NOC-AE-10002515
10CFR26.9
10CFR26.205

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Request for Additional Information
Regarding a Request for Exemption from Certain Requirements of the
Fitness for Duty Rule for Managing Fatigue (TAC Nos. ME2259 and ME2260)

- References:
1. Letter from Charles T. Bowman, STPNOC, to NRC Document Control Desk dated September 21, 2009, "Request for Exemption from Certain Requirements of the Fitness for Duty Rule for Managing Fatigue" (NOC-AE-09002461) (ML092720178)
 2. Letter from Charles T. Bowman, STPNOC, to NRC Document Control Desk dated October 14, 2009, "Revised Request for Exemption from Certain Requirements of the Fitness for Duty Rule for Managing Fatigue" (NOC-AE-09002477) (ML092930172)

In Reference 1, STP Nuclear Operating Company (STPNOC) submitted a request for exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue. Reference 2 is a revised exemption request with supplemental information provided. This submittal responds to NRC questions regarding the request received by electronic mail on January 27, 2010.

There are no new commitments in this submittal.

If you have any questions, please call Ken Taplett at 361-972-8416 or me at 361-972-7454.

Charles T. Bowman
General Manager, Oversight

Attachment: STPNOC Response to Request for Additional Information

STI: 32607579

A 021
NRC

cc:

(paper copy)

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STPNOC RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**South Texas Project (STP)
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Request for Additional Information (RAI)
Regarding a Request for Exemption for Certain Requirements of the
Fitness for Duty Rule for Managing Fatigue (TAC Nos. ME2259 and ME2260)**

NRC RAI

By letter dated September 21, 2009, South Texas Project Nuclear Operating Company, the utility for South Texas Project Station Units 1 and 2 (STP) requested an exemption to permit STP to not meet the 10 CFR 26.205(c) and (d) work hour control requirements when defined conditions (tropical storm force winds and other conditions) are present prior to the declaration of a plant emergency and subsequent to exiting the declared plant emergency.

The stated purpose of the STP request is to allow STP to sequester an appropriate number of plant personnel designated as the "storm crew" prior to the onset of hurricane force winds. These individuals are also needed after the declared emergency until sufficient numbers of plant personnel are able to return to work, to make re-instituting work hour controls possible.

The NRC staff has completed the preliminary review and has determined that response to the following request for information is needed to complete the review.

- 1. Does the STP Hurricane Plan or other site procedure specify the conditions necessary to sequester site personnel? If so, please provide the procedural guidance.**

STPNOC Response

Yes.

The STP Hurricane Plan is plant procedure OPGP03-ZV-0002, "Hurricane Plan."

This procedure defines ENTRY CONDITION (for exception to the Fitness for Duty Rule for Managing Fatigue) as the start time, when any individual on site who performs duties identified in Parts 26.4(a)(1) through (a)(5) of 10CFR does not have to meet the requirements of 10CFR26.205(c) and (d). The definition goes on to state that this occurs when the site enters the STP Hurricane Plan and the EOF Director determines that travel conditions to the site will potentially become hazardous such that storm crew manning will be required based on verifiable

weather conditions. Verifiable weather conditions are defined as when the site is located within the National Hurricane Center 5 day probability cone for predicted winds of Tropical Storm or Hurricane force impact.

“Storm crew manning will be required” is interpreted to mean that site personnel will need to be sequestered in response to the pending storm.

Entry into the Hurricane Plan is initiated at the discretion of the Duty EOF Director using the following as a guide:

1. A Tropical Storm is located in the Gulf of Mexico and is predicted to impact STP.
2. A Hurricane located is in the Gulf of Mexico and is predicted to impact STP.

The RAI refers to sequestering of crews upon the declaration of a plant emergency. For clarification, the exemption request stated that “this exemption should be applied to the period established by the entry and exit conditions defined above regardless whether the Emergency Plan is entered or not.” In other words, the need to sequester crews is determined by the storm threat regardless of the ultimate outcome of whether the storm leads to the declaration of a plant emergency or not.