PMSTPCOL PEmails

From: Elton, Loree [leelton@STPEGS.COM]
Sent: Wednesday, February 03, 2010 3:44 PM
To: Muniz, Adrian; Dyer, Linda; Wunder, George; Tonacci, Mark; Eudy, Michael; Kallan, Paul; Plisco, Loren; Anand, Raj; Foster, Rocky; Joseph, Stacy; Govan, Tekia; Tai, Tom
Subject: Transmittal of Letter U7-C-STP-NRC-100033
Attachments: U7-C-STP-NRC-100033.pdf

Please find attached a courtesy copy of letter number U7-C-STP-NRC-100033, which contains the responses to the NRC staff questions included in Request for Additional Information (RAI) letter number 240 related to Combined License Application (COLA) Part 2, Tier 2, Section 17.4.

The official version of this correspondence will be placed in today's mail. Please call Jim Agles at 860-514-1381 if you have any questions concerning this letter.

Thank you,

Loree Elton
Licensing, STP 3 & 4
leelton@stpegs.com
361-972-4644

Hearing Identifier: SouthTexas34Public_EX
Email Number: 1995

Mail Envelope Properties (C7F098E3C31A0141A02043F0B8E656EE268573DB87)

Subject: Transmittal of Letter U7-C-STP-NRC-100033
Sent Date: 2/3/2010 3:44:19 PM
Received Date: 2/3/2010 3:44:29 PM
From: Elton, Loree

Created By: leelton@STPEGS.COM

Recipients:
"Muniz, Adrian" <Adrian.Muniz@nrc.gov>
Tracking Status: None
"Dyer, Linda" <lcdyer@STPEGS.COM>
Tracking Status: None
"Wunder, George" <George.Wunder@nrc.gov>
Tracking Status: None
"Tonacci, Mark" <Mark.Tonacci@nrc.gov>
Tracking Status: None
"Eudy, Michael" <Michael.Eudy@nrc.gov>
Tracking Status: None
"Kallan, Paul" <Paul.Kallan@nrc.gov>
Tracking Status: None
"Plisco, Loren" <Loren.Plisco@nrc.gov>
Tracking Status: None
"Anand, Raj" <Raj.Anand@nrc.gov>
Tracking Status: None
"Foster, Rocky" <Rocky.Foster@nrc.gov>
Tracking Status: None
"Joseph, Stacy" <Stacy.Joseph@nrc.gov>
Tracking Status: None
"Govan, Tekia" <Tekia.Govan@nrc.gov>
Tracking Status: None
"Tai, Tom" <Tom.Tai@nrc.gov>
Tracking Status: None

Post Office: exgmb1.CORP.STPEGS.NET

Files	**Size**	**Date & Time**
MESSAGE	598	2/3/2010 3:44:29 PM
U7-C-STP-NRC-100033.pdf	601371	

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

Nuclear Operating Company

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

February 3, 2010
U7-C-STP-NRC-100033

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 are the responses to the NRC staff questions included in Request for Additional Information (RAI) letter number 240 related to Combined License Application (COLA) Part 2, Tier 2, Section 17.4. This submittal completes the response to this RAI letter.

The response to RAI 17.4-11 of letter number 240 resulted in a revision to the response for previous RAI 17.4-6. In addition, a minor unrelated revision is submitted to RAI 17.5-2.

The five (5) attachments to this letter address the RAI questions listed below:

17.4-6 R.1 17.4-9 17.4-10 17.4-11 17.5-2 R.1

When a change to the COLA is indicated, it will be incorporated in the next routine revision of the COLA following NRC acceptance of the RAI response.

There are no new commitments in this letter.

If you have any questions, please contact me at (361) 972-7206, or Bill Mookhoek at (361) 972-7274.

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

Executed on 2/3/2010

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

jaa
Attachments:

1. RAI 17.4-6 Response, Revision 1
2. RAI 17.4-9 Response
3. RAI 17.4-10 Response
4. RAI 17.4-11 Response
5. RAI 17.5-2 Response, Revision. 1

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

Director, Office of New Reactors
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Kathy C. Perkins, RN, MBA
Assistant Commissioner
Division for Regulatory Services
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

Alice Hamilton Rogers, P.E.
Inspections Unit Manager
Texas Department of State Health Services
P.O. Box 149347
Austin, TX 87814-9347

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

*Steven P. Frantz, Esquire
A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave. NW
Washington D.C. 20004

*George F. Wunder
*Tom Tai
*Raj Anand
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

(electronic copy)

*George F. Wunder
*Tom Tai
*Raj Anand
Loren R. Plisco
U. S. Nuclear Regulatory Commission

Steve Winn
Eli Smith
Joseph Kiwak
Nuclear Innovation North America

Jon C. Wood, Esquire
Cox Smith Matthews

J. J. Nesrsta
Kevin Pollo
L. D. Blaylock
CPS Energy

RAI 17.4-6, Revision 1

QUESTION:

Section 17.4S.1.4 ("Methods of Analysis for Risk Significant SSC Identification") of the STP FSAR, Revision 2, states that the initial identification of the site-specific, risk-significant systems, structures, and components (SSCs) is based on the process described in Appendix 19K of the reference ABWR DCD. These risk-significant SSCs are included in the scope of the design reliability assurance program (D-RAP). STP's process for maintaining, revising, and establishing new risk rankings for modified design is based on the methodology described in Section 17.4S.1.4 of the STP FSAR, which includes probabilistic risk assessment (PRA) and deterministic techniques. The staff requests that the applicant address the following comments and, if necessary, revise Section 17.4S.1.4 of the STP FSAR accordingly. These comments are related to the methodology for maintaining, revising, and establishing new risk rankings in Section 17.4S.1.4 of the STP FSAR, Revision 2:

- Section 17.4S.1.4.1 ("PRA Risk Ranking") of the STP FSAR describes the methodology for identifying risk-significant SSCs using the PRA and provides the criteria for identifying these risk-significant SSCs (i.e., a Fussell Vesely, FV, importance greater than 0.005 or risk achievement worth, RAW, greater than 2.0). It is not clear from Section 17.4S.1.4.1 of the STP FSAR whether common cause failure basic events would also be subjected to the RAW criteria of 2.0.

- As D-RAP enters the detailed design, procurement, fabrication and construction phase, RAWs and FVs may exist for various PRA models (e.g., internal events, internal fire, and internal flood). Section 17.4S.1.4.1 of the STP FSAR does not address how the risk importance criteria (i.e., FV greater than 0.005 and RAW greater than 2.0) would be applied to the various PRA models that compute RAWs and FVs (e.g.. would the RAW/FV criteria be applied to each PRA model separately, or applied to the combined/integrated results of the PRA models).

- Section 17.4S.1.4 of the STP FSAR does not address the use of the following analyses to identify risk-significant SSCs:

    - The qualitative risk analyses (e.g., seismic margin analysis, SMA, and fire induced vulnerability evaluation, FIVE), and
    - The PRA models for which risk importance measures (e.g., RAW and FV) are not computed.

These analyses are important and should be considered for the identification of risk-significant SSCs in the scope of D-RAP. For example, SSCs under SMA are credited as part of the safe shutdown paths evaluated under the SMA. In addition to being capable of withstanding seismic events, these SSCs need to have high reliability and availability in order to perform their safe

shutdown functions. NEI 00-04 ("10 CFR 50.69 SSC Categorization Guideline") provides several acceptable approaches for using these analyses to identify risk-significant SSCs.

- As stated in Section 17.4S.1.4.1 of the STP FSAR, SSCs or functions having a FV importance greater than 0.005 or RAW greater than 2.0 would be included in the scope of D-RAP and subjected to the approved quality assurance program description (QAPD) referenced in Section 17.5S of the STP FSAR. This criterion is consistent with industry practices and guidance. However, the terms "PRA High" and "PRA Medium" used in Figure 17.4S-2 of the STP FSAR are not defined and no risk importance criteria are associated with these terms.

REVISED RESPONSE:

This response is revised to reflect the changes described in response to RAI 17.4-11.

Common cause failures included in the Level 1 internal events model use the same screening criteria for Fussell-Vesely (FV), $\geq 1.0\%$, or Risk-Achievement Worth (RAW), ≥ 5.0, as independent events, as indicated in Table 19K-1.

The development of the list of risk-significant systems, structures, and components (SSCs) is described in Design Control Document (DCD) Appendix 19K, PRA Based Reliability and Maintenance, which forms initial input to the Design Reliability Assurance Program (D-RAP). Quantitative criteria were developed from the Level 1 internal events model only. Level 2 input, Seismic Margins Analysis (SMA) input, Fire Vulnerability Evaluation (FIVE) input, and Low Power and Shutdown (LPSD) input to D-RAP were developed qualitatively in Appendix 19K. Appendix 19K.11 summarizes the results from the individual elements of the PRA model of the ABWR and recommends maintenance, or maintenance and test intervals, for the important SSCs from these elements. The summary of results for the PRA and other analyses were used to determine the appropriate reliability and maintenance-related activities which are then summarized in Table 19K-4. These are inputs for the D-RAP. NEI 00-04 was not used in developing the screening criteria for the other models, such as SMA, FIVE and LPSD, included with the PRA. It can be seen from the above description that there is no integrated PRA Model to which the FV/RAW criteria is applied. D-RAP will continue to use this process during the design phase.

The qualitative risk analyses (e.g., SMA and FIVE) and PRA models for which risk importance measures are not available were evaluated in the ABWR DCD Appendix 19K. As part of D-RAP they will be addressed by the Expert Panel as shown in FSAR Figure 17.4S-1 (no revision to COLA Section 17.4S.1.4 is required to reflect this).

The term “PRA Medium” will be removed from Figure 17.4S-1 and from Figure 17.4S-2 (by deleting Figure 17.4S-2 since it only provided information already included in the text).

As a result of this RAI response COLA Revision 3 Part 2, Tier 2, Section 17.4S will be revised as follows with changes indicated by gray shading (Figure 17.4S-2 was simply deleted):

17.4S.1.2.2 Design Change Feedback

The design control and change processes provide feedback to the Risk Management organization via identification of components on the MED that are affected by a proposed change. Those affected SSCs with ~~medium or~~ high risk are given additional review in accordance with approved criteria to ensure there is no potential impact to the risk ranking of the affected components. If potential impact is identified then the Risk and Analysis Organization must concur in the change.

17.4S.1.4 Methods of Analysis for Risk Significant SSC Identification

The PRA and deterministic methods are described more fully below ~~(also refer to Figure 17.4S-2)~~.

17.4S.1.4.1 PRA Risk Ranking

A component's risk determination is based upon its impact on the results of the PRA. STP's PRA calculates both core damage frequency (CDF) and containment response to a core damaging event, including large early release frequency (LERF). The PRA models internal initiating events at full power, and also accounts for the risk associated with external events, including external flooding, seismic events, and fire, internal flooding, and events occurring during low power and shutdown. The PRA risk categorization of a component is based upon its Fussell-Vessely (FV) importance, which is the fraction of the CDF and LERF to which failure of the component contributes, and its risk achievement worth (RAW), which is the factor by which the CDF and LERF would increase if it were assumed that the component is guaranteed to fail. Specifically, PRA risk categorization to identify SSCs is based upon the following:

PRA Ranking	~~STPNOC~~ PRA Criteria
~~Greater than Low~~HIGH (Risk Significant)	Greater than Low FV ~~>~~≥ 0.005 or RAW ~~>~~ ≥ 2.0
~~Low~~LOW (Non-risk Significant)	FV < 0.005 and RAW < 2.0

17.4S.1.4.2 Deterministic Risk Ranking

The numerical values, after weighting, are summed; the maximum possible value is 100. Based on the sum, functions are categorized as follows:

SCORE RANGE	**CATEGORY**
100 – ~~71~~ 41	~~HSS~~ HIGH (Risk Significant)
~~70 – 41~~	~~MSS~~
40 – ~~21~~ 0	~~LSS~~ LOW (Non-risk Significant)
~~20 – 0~~	~~NRS~~

A function with a low categorization due to a low sum can receive a higher deterministic categorization if any one of its five questions received a high numerical answer. Specifically, a weighted score of ~~25~~15 or more on any one question results in a ~~HSS~~ HIGH categorization.~~; a weighted score of 15-20 on any one question results in a minimum categorization of MSS; and a weighted score of 9-12 on any one question results in a minimum categorization of LSS LOW.~~ This is done to ensure that a function with a significant risk in one area does not have that risk contribution masked because of its low risk in other areas.

17.4S.4 Maintenance Rule/Operational Programs

Many SSCs would meet the criteria to be in the MR program without considerations related to the RAP. In cases where the RAP identifies a high ~~or medium~~ risk SSC that would not otherwise have been in the MR program, then the SSC is added. For those SSCs already in the Technical Specifications (TS), Inservice Inspection (ISI), or Inservice Testing (IST) programs, their performance under these programs is factored into the performance monitoring accomplished under the MR program.

17.4S.5 Non-safety SSC Design/Operational Errors

The process for providing corrective actions for design and operational errors that degrade nonsafety-related SSCs within the scope of RAP is procedurally defined. All SSCs (safety-related or nonsafety-related) with risk significance ~~greater~~ other than ~~low~~LOW are entered into the MR program as ~~High Safety Significance (HSS)~~ HIGH. The STPNOC MR program does not distinguish between a Maintenance Rule Functional Failure (MRFF) and a Maintenance Preventable Functional Failure (MPFF). Therefore, nonsafety-related SSCs that have experienced a MRFF attributable to a design or operating error (i.e. could not have been prevented by maintenance) are corrected using the corrective action process described in the QAPD of Section 17.5S. Under the STPNOC MR program, MRFFs require cause determination (may be an apparent cause determination) and corrective action is implemented to prevent recurrence.

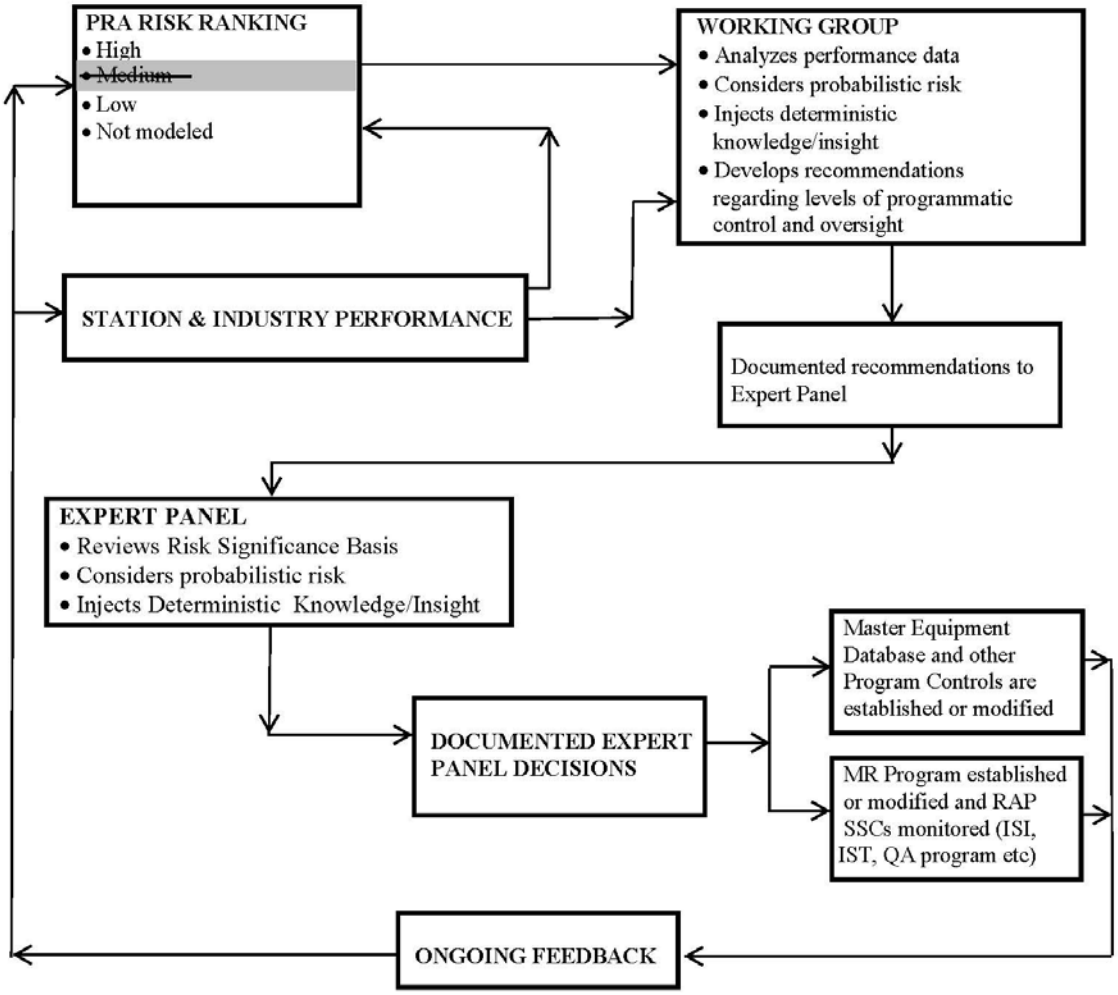

Figure 17.4S-1 Reliability Assurance Process

Note 1: Maintenance Rule program implemented 30 days prior to fuel load

Note 2: Working group(s) are chaired by an Expert Panel member

RAI 17.4-9

QUESTION:

The staff requested in RAI 17.4-1 that STP include in Section 19K of the STP FSAR the specific SSCs that are in scope of the RAP associated with the risk-significant common cause failures (CCFs) of the HPCF, RHR, RBCW, and RSW systems. In response to RAI 17.4-1, STP proposed to include in FSAR Section 19K those SSCs of the HPCF, RHR, RBCW, and RSW systems whose CCFs are significant contributors to system unavailability or core damage frequency (CDF), which are identified in the ABWR Standard Safety Analysis Report (SSAR), Section 19D.8.6. As explained below, the staff found that the SSCs of the HPCF, RHR, RBCW, and RSW systems that STP proposed to add to the scope of RAP as a result of CCFs may not be complete.

Based on Section 19D.8.6 of the ABWR SSAR, the following SSCs are considered in the CCF sensitivity analysis for the HPCF, RHR, RBCW, and RSW systems: pumps, pump auxiliary equipment, manual valves, motor-operated valves, check valves, room air conditioners, spargers, strainers, circuit breakers, flow transmitters, heat exchangers, and temperature elements. Section 19D.8.6 of the ABWR SSAR also identified the most significant CCF contributors to system unavailability or CDF for these systems (e.g., pumps, strainers, room air conditioners). It should be noted, however, that those SSCs whose CCFs are not significant contributors to system unavailability or CDF can still be risk important (i.e., the CCFs of these SSCs can have a high risk achievement worth (RAW) or Fussell Vesely (FV)), and, therefore, should be evaluated for inclusion in the scope of RAP. For example, based on the discussion in Section 19D.8.6 of the ABWR SSAR, CCF of the HPCF pumps is a significant contributor to system unavailability or CDF and has a high risk importance according to Table 19K-1 of the STP FSAR. While CCF of the HPCF check valves may not be a significant contributor to system unavailability or CDF, its CCF risk importance (e.g., RAW) would be very similar to that of the HPCF pumps, and, therefore, should be include in the scope of RAP.

Since Section 19D.8.6 of the ABWR SSAR addresses CCF of numerous SSCs for the HPCF, RHR, RBCW, and RSW systems (e.g., the CCFs of pumps, pump auxiliary equipment, manual valves, motor-operated valves, check valves, room air conditioners, spargers, strainers, circuit breakers, flow transmitters, heat exchangers, and temperature elements), the staff requests that the applicant re-evaluate these SSCs for inclusion in RAP considering their CCF risk importance (e.g., RAW and FV).

RESPONSE:

The information requested by this Request for Additional Information was not developed as part of the ABWR Standard Safety Analysis Report or Design Control Document. This data is being developed in support of the PRA that will satisfy the requirements of 10 CFR 50.71(h).

The source for the Common Cause Failure (CCF) data used in the Standard Safety Analysis Report (SSAR) PRA, the EPRI Utility Requirements Document, does not identify a large number of equipment specific CCF terms, instead data are provided for "Key" components, so a generic common cause term was used for the sensitivity analysis described in SSAR Section 19D.8.6:

> "Where common-cause factors were not given for specific component types, the recommended "generic" factors were used."

The EPRI Utility Requirements Document does not list generic common cause failure parameters, nor is the data used described in SSAR Section 19D.8. Newer data, such as that contained in the Common Cause Data Base maintained by Idaho National Laboratory and described in NUREG/CR-6268, "Common-Cause Failure Database and Analysis System," published in 1998, and Revision 1 published in September 2007, suggests that many, if not most, equipment CCF parameters are significantly different based on current operating data. The STP PRA being developed to satisfy 10CFR50.71(h) is using CCF parameters developed from this data source and incorporating detailed CCF modeling at the inter-system and inner-system level.

The SSCs identified in the question above (e.g., pump auxiliary equipment, manual valves, motor-operated valves, check valves, room air conditioners, spargers, strainers, circuit breakers, flow transmitters, heat exchangers, and temperature elements) will be evaluated by the Design Reliability Assurance Program Expert Panel using the process described in FSAR Section 17.4S.4 as detailed design progresses.

No changes to the COLA are required as a result of this response.

RAI 17.4-10

QUESTION:

The staff requested in RAI 17.4-3 that STP clarify whether the CWS pump circuit breakers are risk-significant and revise Section 19K of the STP FSAR accordingly. In response to RAI 17.4-3, STP stated that tripping of the CWS pumps on detection of turbine building flooding is not required for flooding control. As such, STP identified the changes to be made to Section 19K.7 of the STP FSAR. The staff agreed with these changes. However, STP did not address the necessary changes to Table 19K-4 of the STP FSAR, Revision 2, that considers the CWS pump circuit breaks as risk-significant through incorporation by reference to the ABWR DCD. The staff requests that STP revise Table 19K-4 of the STP FSAR accordingly.

RESPONSE:

Table 19K-4 will be modified as shown below to remove the Circulating Water Pump Breakers from the list of Failure Modes and Reliability Assurance Program activities. Appendix 19K will be modified as shown below to reflect STP DEP 10.4-2 as the basis of the change.

19K PRA-Based Reliability and Maintenance

STP DEP 10.4-2 (Table 19K-4)

19K.7 Determination of "Important Structures, Systems and Components" for Flood Analysis

STP DEP 10.4-2

Table 19K-4 Failure Modes and RAP Activities (Continued)

Component	Failure Mode/Cause	Recommended Maintenance	Test or Maintenance Interval	Basis	Unavailability, Failure Rate
Control and Reactor Building, RSW pump House, *and ECCS Room Watertight Doors*	*Failure to retain integrity*	*Inspection of watertight doors, including penetrations*	*1 year & after major maintenance*	*Judgment*	*
RSW ~~and CWS~~ Pump Circuit Breakers	*Failure to trip pump on demand*	*Breaker trip test to assure trip on Demand*	*6 months*	*Judgment*	*

RAI 17.4-11

QUESTION:

The first paragraph of STP's response to RAI 17.4-6 states "Common cause failures included in the Level 1 internal events model use the same screening criteria for Fussell-Vesely (FV), ≥ 1.0%, and Risk-Achievement Worth (RAW), ≥ 2.0, as independent events, as indicated in Table 19K-1." The above listed criteria seems to be inconsistent in that, according to Tables 19K-1 and 19K-2 of the ABWR Standard Safety Analysis Report (SSAR) the criteria used are FV greater than 1.0% or RAW greater than 5. Also, Section 17.4S.1.4.1 ("PRA Risk Ranking") of the STP FSAR uses the criteria FV greater than 0.5% and RAW greater than 2.0. The staff requests that STP provide clarification of the first paragraph in STP's response to RAI 17.4-6.

Based on STP's response to RAI 17.4-6, STP seemed to have merged the "Medium" risk category into the "High" risk category. [For example, in STP FSAR, Revision 2, Section 17.4S.1.4.2 ("Deterministic Risk Ranking") the "High" category had a score range between 71 and 100, while the "Medium" category had a score range between 41 and 70. In STP's response to RAI 17.4-6, the mark-up of STP FSAR, Section 17.4S.1.4.2 shows that the "Medium" category was deleted and the "High" category now has a score range between 41 and 100.] The staff found this to be acceptable. However, the following revised text to STP FSAR, Section 17.4S.1.4.2, which is provided in the response to RAI 17.4-6, does not seem to be appropriate: "Specifically, a weighted score of 25 on any one question results in a ~~HSS~~ HIGH categorization; ~~a weighted score of 15-20 on any one question results in a minimum categorization of MSS~~…" Since the "Medium" category was included in the scope of RAP under Revision 2 of the STP FSAR and is now merged into the "High" category, it would suggest that the above statement should infer that a weighted score between 15 and 25 on any one question results in a HIGH categorization. For example, loss of an SSC function that is safety significant for shutdown (i.e., weight value of 3 in Section 17.4S.1.4.2) that has a high impact and/or occurs frequently (i.e., numerical answer of 5 in Section 17.4S.1.4.2) would have a weighted score of 15 and should be included in the "High" category. Another example, loss of an SSC function that directly fails another risk-significant system (i.e., weight value of 4 in Section 17.4S.1.4.2) that has a high impact and/or occurs frequently (i.e., numerical answer of 5 in Section 17.4S.1.4.2) would have a weighted score of 20 and should be included in the "High" category.

The staff requests that STP clarify in the STP FSAR the deterministic criteria relating to a low categorization receiving a high categorization if any one question received a high numerical answer. Also, FSAR Sections 17.4S.1.2.2 and 17.4S.4 should be appropriately modified since these sections use the terms "medium or high risk".

RESPONSE:

The first paragraph of the response to RAI 17.4-6 will be revised as indicated below.

> Common cause failures included in the Level 1 internal events model use the same screening criteria for Fussell-Vesely (FV), ≥ 1.0%, ~~and~~or Risk-Achievement Worth (RAW), ≥ ~~2.0~~5.0, as independent events, as indicated in Appendix 19K, Table 19K-1.

To be consistent with the implementation guidance for the Maintenance Rule and the risk-significant criteria for potential risk-informed applications, the criteria used to provide PRA risk-significant information to the Design Reliability Assurance Program Expert Panel will be the more inclusive screening criteria of F-V ≥ 0.5% or RAW of ≥ 2.0 as described in Section 17.4S.1.4.1.

Section 17.4S.1.4.2, PRA Risk Ranking will be revised as shown below to reflect the deletion of the "Medium" Classification described in the response to RAI 17.4-6. The FSAR mark-up shown in the response to RAI 17.4-6 will also be revised so that the proposed FSAR wording for 17.4S.1.4.2 is consistent in both places.

Note that RAI 17.4-6 previously showed FSAR revisions to delete "Medium" from sections 17.4S.1.2.2 and 17.4S.4. Due to the proximity of the response to the COLA Revision 3 issuance date, these changes were not incorporated into Revision 3 but will be included in a future COLA revision.

As a result of this RAI response COLA Part 2, Tier 2, Section 17.4S will be revised as follows with changes indicated by gray shading:

17.4S.1.4.2 Deterministic Risk Ranking

A function with a low categorization due to a low sum can receive a higher deterministic categorization if any one of its five questions received a high numerical answer. Specifically, a weighted score of 15 or more ~~of 25~~ on any one question results in a ~~HSS~~ HIGH categorization.~~; a weighted score of 15-20 on any one question results in a minimum categorization of MSS; and a weighted score of 9-12 on any one question results in a minimum categorization of LSS LOW.~~ This is done to ensure that a function with a significant risk in one area does not have that risk contribution masked because of its low risk in other areas.

RAI 17.5-2, Revision 1

QUESTION:

Subpart C of 10 CFR Part 52 identifies the general provisions for combined licenses. More specifically, 10 CFR Part 52.79 identifies the technical information required to be contained in the final safety analysis report. Section 2.5 of STP's QAPD states that, "10 CFR 50.34(b)(6)(ii) and 10 CFR Part 52.59(a)(25) requires that the Final Safety Analysis Report(FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied." In this statement, STP references 10 CFR 52.59, instead of 10 CFR 52.79. The application also references 10 CFR 50.34, which no longer will be required. Please justify or amend these departures.

REVISED RESPONSE:

STPNOC is revising the change to the Quality Assurance Program Description (QAPD) originally proposed by this response to reflect the manner in which the Nuclear Energy Institute (NEI) revised corresponding Part II, Section 2.5 of NEI 06-14A, Quality Assurance Program Description.

Part II, Section 2.5, paragraph two of the QAPD will be changed to correct the error as follows:

> ~~10 CFR 50.34(b)(6)(ii) and 10CFR Part 52.59 52.79 (a) (25) (27)~~ Regulations requires that the Final Safety Analysis Report (FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied. In order to comply with this requirement, the FSAR references this QAPD and, as a result, the requirements of 10 CFR 50.54(a) are satisfied by and apply to the QAPD.

No changes to the COLA are required as a result of this response.