



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

February 24, 2010  
U7-C-STP-NRC-100050

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  
STP 3&4 Combined Operating License Application Schedule Challenges

References:

1. Letter, Scott Head to Document Control Desk, "Response to Request for Additional Information," dated February 10, 2010, U7-C-STP-NRC-100036
2. Letter, Scott Head to Document Control Desk, "Responses to Requests for Additional Information," dated September 21, 2009, U7-C-STP-NRC-090146 (ML092710096)
3. Letter, Mark McBurnett to Document Control Desk, "Request for Meeting on Request for Additional Information 09.01.01-3," dated February 18, 2010 U7-C-STP-NRC-100042

Several schedule challenges have been identified as the South Texas Project (STP) 3 & 4 Combined Operating License Application (COLA) review approaches the Draft Safety Evaluation Report (SER) milestone. The schedule challenges were discussed in a meeting with David Matthews and Frank Akstulewicz on February 17, 2010. STPNOC is fully committed to support the schedule with the resources necessary to allow the NRC to complete their review in accordance with the overall schedule and will work aggressively to close all open items identified. The status of the challenges as STPNOC understands them is discussed below, along with current STPNOC planned actions. STPNOC understands that while these challenges may affect the intermediate schedule for the affected SER sections, the NRC is continuing to move forward with their review and with the Advisory Committee on Reactor Safeguards (ACRS) meetings, and does not view these issues as challenges to the Phase 6 schedule.

STPNOC submitted responses to Requests for Additional Information (RAIs) on Sections 3.7 and 3.8 (Reference 1) with commitments for additional information to be provided on April 15, April 30, and May 31, 2010. These responses included detailed technical information on the scope, methodology, acceptance criteria, and expected results for the current soil structure

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interaction work being performed. The additional information to be provided is largely confirmatory. We understand that the NRC may perform an audit and a confirmatory analysis in this area and are prepared to fully support both of these activities in a timely manner.

In response to RAI 02.04.12-33 (Reference 2), STPNOC submitted a revised groundwater model on September 21, 2009. The NRC has indicated that they are performing a confirmatory calculation that will be completed in May, 2010. STPNOC is not aware of any additional information required to support the NRC's review, but is prepared to provide any support requested.

The NRC issued RAI 02.05.02-28 on February 1, 2010, requesting a revision to the seismic source analysis, considering additional data on Gulf Coast region earthquakes. While we believe that we followed the regulatory guidance in preparing the analysis, we also do not believe that the additional data will have a meaningful effect on the conclusion. We are performing a sensitivity study using the additional data to evaluate the effect. This is expected to be provided to the NRC in response to the referenced RAI by March 18, 2010.

The NRC and STPNOC have had an ongoing dialog in RAIs and meetings in regard to flow induced vibration of components in the nuclear steam supply system. STPNOC has scheduled a meeting with the NRC on March 3, 2010, to discuss resolution of this issue. STPNOC will provide a plan for STP Unit 3 to conduct the necessary prototype analysis and testing to satisfy Regulatory Guide 1.20, Revision 3.

The NRC issued RAI 09.01.01-3 on January 19, 2010, requesting information required by four Combined License Information Items related to the criticality analyses of the new and spent fuel racks. As discussed in my letter to the NRC dated February 18, 2010 (Reference 3), STPNOC is prepared to provide the required information following a meeting with the NRC to ensure that we have a complete understanding of the necessary information.

There are no commitments in this letter.

If there are any questions regarding this information, 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 2/24/2010



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

rhs

cc:

(paper copy)

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