Nuclear Operating Company

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

April 5, 2010
U7-C-STP-NRC-100076

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, Mark McBurnett to Document Control Desk, "Response to Request for Additional Information," dated January 14, 2010, U7-C-STP-NRC-100017 (ML100190245).

The attachment to this letter revises the response to Request for Additional Information (RAI) 19-29 that was provided in the reference identified above.

19-29 Revised Response

There are no new commitments in this letter. Commitment 19.9-4 is revised to include the Diesel Fuel Oil Storage vaults described in the revised RAI response.

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

STI 32646064

D091
NRO

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

Executed on 4/5/10

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

dws

Attachment:

1. RAI 19-29, Revised Response
2. Summary of Commitment COM 19.9-4

cc: w/o attachment except*
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RAI 19-29, Revision 1

QUESTION:

In your August 26, 2009 response to RAI 19-27, you stated that:

> "The confirmatory action stated in COLA Section 19.9.4 will be revised to include [in part] the following [item]:
>
> 2. Calculation of HCLPF values for site-specific SSCs (UHS/Pump House structure and Cooling Tower) whose failure may affect the plant response to seismic events and which are not included in the analyses described in Appendix 19H."

With respect to item 2 above, you elaborated that HCLPF values for site-specific SSCs (UHS/Pump House structure and Cooling Tower) whose failure may affect the plant response to seismic events and which are not included in the analyses described in Appendix 19H will be established. This will be completed by September 2010. However, there is no mention of Reactor Service Water System as part of the item. The staff also noted that in its response the applicant specifically mentions the UHS/Pump House structure and Cooling Tower as the items not explicitly included among the generic SSC in 19H, but which need to be analyzed as part of the plant specific Category I structures. ABWR DCD, Revision 4, Section 19.9.26 Reactor Service Water Systems Definition, specifically requires the COL applicant to review RSW and UHS design configurations and performance capabilities against those assumed and modeled in the DCD and SSAR. The RSW system consists of piping, tunnel structures and connections to Pump House and Control Building.

Therefore, the applicant's response to item 2 is considered incomplete and needs to be augmented. The staff requests for the applicant to clarify if the RSW system, together with its related piping, tunnel structures and connections to Pump House and Control Building, is included within the item. If not, then please include a discussion regarding the basis for not including the system and its related components as part of the item 2.

REVISED RESPONSE:

This revised response provides additional information to the Request for Additional Information (RAI) response provided in STP Letter U7-C-STP-NRC-100017, dated January 14, 2010 (ML100190245) for RAI 19-29. Changes to the original response are shown below.

The Reactor Service Water (RSW) Piping Tunnel and Diesel Generator Oil Storage Vault will be included in Item 2 of our response to RAI 19-27 for calculation of HCLPF value. The RSW piping was considered in the Seismic Margin Analysis, see Service Water System included in the DCD Table 19I-1. This piping is included in the post-construction walkdown and HCLPF validation identified in DCD Section 19H.5.1.

The revision proposed for COLA Section 19.9.4 in RAI 19-27 will be replaced with the following COLA revision as a result of this response. The only change is to add RSW Piping Tunnel and Diesel Generator Oil Storage Vault in item 2.

19.9.4 Confirmation of Seismic Capacities Beyond the Plant Design Basis

The following standard supplement addresses COL License Information Item 19.4.

~~The seismic capacity analysis will be completed prior to fuel loading and the PRA will be updated in accordance with 10 CFR 50.71(h)(1). (COM 19.9-4)~~

The following actions will be taken (COM 19.9-4) and the FSAR updated in accordance with 10 CFR 50.71(e) based upon the results of these analyses:

1. The High-Confidence Low Probability of Failure (HCLPF) values for the important plant-specific/as-built components corresponding to the generic components defined in Subsection 19H.4.3 shall be determined. The values will be compared to the assumed HCLPF values given in Tables 19H-1 or 19I-1. This will be completed prior to fuel load.

2. HCLPF values for site-specific SSCs (UHS/Pump House structure, Cooling Tower, and RSW Piping Tunnel, and Diesel Generator Oil Storage Vault) whose failure may affect the plant response to seismic events and which are not included in the analyses described in Appendix 19H will be established. This will be completed by September 2010 and included in the COLA at the next scheduled update in accordance with 10 CFR 50.71(e) to incorporate these HCLPF values into Appendix 19H.

3. The investigation for the potential for seismic induced soil failure at 1.67 times the site-specific SSE will be completed prior to fuel load.

4. The remainder of the actions specified in Appendix 19H.5 will be completed prior to fuel load.

COM 19.9-4

Commitment	Description	Completion Date
COM 19.9-4 CR 07-14004 Action 1	The High-Confidence Low Probability of Failure (HCLPF) values for the important plant-specific/as-built components corresponding to the generic components defined in Subsection 19H.4.3 shall be determined. The values will be compared to the assumed HCLPF values given in Tables 19H-1 or 19I-1.	Prior to fuel load
COM 19.9-4 CR 07-14004 Action 2	HCLPF values for site-specific SSCs (UHS/Pump House structure, Cooling Tower, and Diesel Generator Oil Storage Vault) whose failure may affect the plant response to seismic events and which are not included in the analyses described in Appendix 19H will be established.	September 2010
COM 19.9-4 CR 07-14004 Action 3	The investigation for the potential for seismic induced soil failure at 1.67 times the site-specific SSE.	Prior to fuel load
COM 19.9-4 CR 07-14004 Action 4	The remainder of the actions specified in Appendix 19H.5.	Prior to fuel load