

## PMSTPCOL PEmails

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**From:** Muniz, Adrian  
**Sent:** Thursday, April 01, 2010 10:21 AM  
**To:** Cashell, George S  
**Subject:** Chapter 14 Draft RAI 4581  
**Attachments:** RAI 4581.doc

Steve:

I have attached to this electronic communication a draft request for additional information (RAI) for Chapter 14 of the STP COLA. If you need a conference call to clarify the requested information, please contact me. If a conference call is not needed, please send me an email and I will continue the formal process of issuing the RAI to STPNOC.

Thanks,

Adrian Muñiz, USNRC

**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 2071

**Mail Envelope Properties** (Adrian.Muniz@nrc.gov20100401102100)

**Subject:** Chapter 14 Draft RAI 4581  
**Sent Date:** 4/1/2010 10:21:20 AM  
**Received Date:** 4/1/2010 10:21:00 AM  
**From:** Muniz, Adrian

**Created By:** Adrian.Muniz@nrc.gov

**Recipients:**  
"Cashell, George S" <gscashell@STPEGS.COM>  
Tracking Status: None

**Post Office:**

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Request for Additional Information No. 4581 Revision 3

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013

SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants  
Application Section: Section 14.2

QUESTIONS for Quality and Vendor Branch 2 (ESBWR/ABWR) (CQVB)

14.02-\*\*\*

In accordance with RG 1.206, Regulatory Position C.III.4.3, "Combined License Information Items That Cannot Be Resolved Before the Issuance of a License," justify why the three post COL items below for the STP Units 3 and 4 ITP should be license commitments instead of license conditions. Otherwise, identify these post COL items as license conditions in FSAR Section 14.2.13, "COL Information Items."

**License Conditions for Post Combined License (COL) Items**

License Condition for Preoperational and Startup Test Specifications and Procedures, COL License Information Item 14.2, Items (1) through (4)

During the post-licensing period, COM 14.2-2, COM 14.2-3, and COM 14.2-4 will be the subject of NRC inspections to verify that the licensee implements the ITP. This process shall allow for the performance of necessary plant as-built inspections and walk downs. Therefore, COM 14.2-2, COM 14.2-3, and COM 14.2-4 should be controlled through a license condition to ensure the availability of preoperational and startup test specifications and test procedures to on-site NRC inspectors.

License Condition for the Power Ascension Test Phase, COL License Information Item 14.2, Items (6) and (7)

Certain milestones in the startup testing phase of the ITP (e.g., pre-critical testing, criticality testing, and low-power testing) should be controlled through this license condition to ensure that the designated licensee management reviews, evaluates, and approves relevant test results before proceeding to the power ascension test phase. Accordingly, the licensee shall perform the following:

- (a) Complete all pre-critical and criticality testing and confirm that the test results are within the range of values predicted in the FSAR acceptance criteria. After completing and evaluating criticality test results, the licensee will conduct low-power tests and will operate the facility at reactor steady-state core power levels not in excess of 5 percent power, in accordance with the conditions of the license.
- (b) Complete all low-power testing and confirm that the test results are within the range of values predicted in the acceptance criteria in the facility's FSAR. After completing and evaluating low-power test results, the licensee will conduct power ascension testing and will operate the facility at reactor steady-state core power

levels not in excess of 100 percent power, in accordance with the conditions of the license.

The licensee shall complete and evaluate the adequacy of all test results above and make them available to on-site NRC inspectors.

License Condition for the Test Program Schedule, COL Information Item 14.2, Item (8)

In accordance with the ABWR DCD; COL Information Item (8); RG 1.206, Regulatory Position C.III.4.3, Item (3), in FSAR Sections 14.2.11, the NRC staff identified COM 14.2-1 as a license condition. The licensee shall provide the schedule for each major phase of the ITP to on-site NRC inspectors 6 months before commencement of the ITP. The licensee shall provide the on-site NRC inspectors with periodic updates to the schedule, as appropriate.