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May 27, 2010
U7-C-STP-NRC-100115

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 is the response to NRC staff question included in Request for Additional Information (RAI) letter number 340 related to Combined License Application (COLA) Part 2, Tier 2, Section 3.11. This completes the response to the letter. The attachment provides the response to RAI question:

RAI 03.11-7

Where there are COLA markups, they will be made at the first routine COLA update following NRC acceptance of the RAI response.

There are no commitments in this letter.

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

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

Executed on 5/27/10

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

jep

Attachment: RAI 03.11-7

D091
NRO

STI 32679748

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

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RAI 03.11-7

QUESTION:

Subsection 3.11.7 "Operational Information," of the STP Units 3 & 4 FSAR states the following: "The EQ Program for STP 1 & 2 has been reviewed and approved by the NRC (NUREG-0781 Supplement 4, Safety Evaluation Report Related to the Operation of South Texas Projects Units 1 & 2") and has been fully implemented. The EQ Program for the STP 3 & 4 will be consistent with the STP 1 & 2 Program, taking into consideration the appropriate differences between the existing and new units."

As discussed in Regulatory Guide 1.206 and Commission Paper SECY-05-0197, COL applicants must fully describe their operational programs to avoid the need for ITAAC regarding those programs. Therefore, the NRC staff requests that STPNOC delete reference to the STP 1 & 2 operating plant EQ program and address the operational aspects of the EQ program in the STP Units 3 & 4 FSAR.

RESPONSE:

To address the request as stated in this RAI, the STP 3&4 COLA will be revised to remove the reference to the STP 1&2 Operational EQ Program. The COLA will provide a discussion of the STP 3&4 Operational EQ Program. The changes are provided in the markup below. It should be noted that the development of the detailed Operational EQ Program will be in accordance with the plan described in FSAR Subsection 13.4S for Operational Program implementation. As noted therein, the Operational Environmental Qualification Program will be implemented prior to fuel load.

STP 3&4 COLA Part 2, Tier 2, Subsection 3.11.7 will be changed as shown below. Changes to COLA Revision 3 are identified in gray shading:

3.11.7 Operational Information

The following site-specific supplement provides an operational program description of the STP 3&4 Environmental Qualification (EQ) Program.

~~The EQ Program for STP 1 & 2 has been reviewed and approved by the NRC (NUREG 0781 Supplement 4) and has been fully implemented. The EQ Program for STP 3 & 4 will be consistent with the STP 1 & 2 Program, taking into consideration the appropriate differences between the existing and new units. The EQ Program prescribes the methodology for performing activities required to establish, maintain, and document the environmental qualification of safety-related equipment as defined in Subsection 3.11.1.~~

~~The programs for preventive maintenance, surveillance, and periodic testing provide for replacement of parts and equipment prior to the end of qualified life. This ensures that all equipment covered by the EQ Program will be operable and qualified throughout the life of the plant.~~

~~The EQ Program establishes organizational responsibilities for various activities such as design changes, procurement, work control, and maintenance and prescribes procedural controls for evaluating changes, preparing documentation, maintaining databases, calculating qualified life~~

~~of components, performing various technical evaluations, and reviewing equipment purchase specifications.~~

Equipment qualification activities for the STP 3&4 project that affect safety-related equipment will be conducted by detailed, written, and approved procedures and instructions. These procedures and instructions include the Operating Equipment Qualification Program (OEQP) in the Operation, Emergency Response, Maintenance, Test, Inspection, and Surveillance activities in the plant.

The EQ process verifies that each safety-related structure, system and component is appropriately qualified for use in the STP 3&4 project. EQ files are maintained for all safety-related equipment and non-safety-related post-accident monitoring devices that are subject to a harsh environment. The records generated by this program form the basis for the STP 3&4 equipment qualification operational program. The files are maintained for the operational life of the plant. Central to the EQ Program is the EQ Equipment List. The EQ Equipment List identifies the electrical, mechanical, and I&C equipment or components that must be environmentally qualified for use in a harsh environment.

EQ data packages are developed in accordance with industry standard practices. During construction, the Constructor will be responsible for ensuring that mounting, support, and connection configurations established during EQ are maintained in the installed condition. Deviations from the qualified configuration must be evaluated and documentation of the evaluations maintained in the EQ record files as Quality Assurance records in auditable form for the life of the plant. Upon completion of construction and beginning with the first system startup activities, EQ document packages are turned over to STPNOC as systems are completed and accepted by STPNOC. Field changes will be reviewed to ensure that parameters established during EQ are maintained. Deviations will be evaluated and documented in the EQ record files.

The program is responsible for all aspects of the continuing EQ program such as:

- Maintenance of the EQ Equipment List
- Plant procedures for control and maintenance of the EQ documentation
- Evaluation of design and qualified life to support continued operation
- Addressing programmatic aspects of the OEQP such as aging of non-metallic parts
- Evaluating engineering and design questions as they arise such as synergistic effects during long term power operations while allowing for considerations like available operating life with a margin for fulfilling important to safety functions during a DBA or other analyzed accident
- Surveillance and maintenance activities of safety-related equipment based on the equipment qualification program results and manufacture recommendations
- Procurement of replacement safety-related parts

These programs are implemented, documented and controlled by appropriate plant operating and maintenance procedures and are administered by the plant staff.