



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



May 27, 2010
U7-C-STP-NRC-100117

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 No. 52-001
Response to Request for Additional Information

Reference: Letter, Scott Head to Document Control Desk, "Response to Request for Additional Information," dated February 25, 2010, U7-C-STP-NRC-100052.

This letter provides revised responses to Request for Additional Information (RAI) questions 03.08.04-2 and 03.08.04-4 related to the application to amend the ABWR DCD Amendment Part 2, Tier 2, Section 3.2 provided in Attachments 1 and 2 to the referenced letter.

The attachments to this letter provide the revised responses to the following RAI questions:

03.08.04-2 03.08.04-4

Changes will be incorporated into the next update of the ABWR DCD Amendment request after review by the NRC Staff.

There are no commitments in this letter.

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

DOSO
LRO

STI 32682067

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

fjp

Attachments:

1. Question 03.08.04-2
2. Question 03.08.04-4

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.
Inspection Unit Manager
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

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

*Paul Kallan
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

(electronic copy)

*George F. Wunder
*Paul Kallan
Loren R. Plisco
U. S. Nuclear Regulatory Commission

Steve Winn
Joseph Kiwak
Eli Smith
Nuclear Innovation North America

Jon C. Wood, Esquire
Cox Smith Matthews

Richard Peña
Kevin Pollo
L. D. Blaylock
CPS Energy

RAI 03.08.04-2 Revision 1**QUESTION**

Section 9.5.14.1, "System Description," of the ABWR DCR amendment application states that, "The injection is provided through the non-safety-related portion of the CUW tie-in lines to the feedwater system. The tie-in is in the R/B portion of the Steam Tunnel. A single AFI system may be used with the injection configured to support more than one unit of a multiple unit site." Please confirm if any piping seismic response analysis of the modified CUW tie-in lines to the feedwater system, modeled in conjunction with the AFI line, was performed to ensure that the effects of the AFI line addition are accounted for within the seismic design basis of the original feedwater piping and supports. Clarify if the design basis of the feedwater system will be adversely affected by the addition of the AFI line. Also, summarize the results of these analyses, if any.

REVISED RESPONSE:

This revised response incorporates NRC review comments received at the NRC AIA audit at ANATECH from May 17 - May 21, 2010. Changed portions from the previous response are noted with a revision bar in the margin.

The piping seismic response analysis of the modified reactor water cleanup system (CUW) tie-in lines to the feedwater system has not yet been performed. This analysis must be performed following completion of detailed design after determination of such details as pipe routing, location of pipe supports and restraints, final line sizes, etc. The final piping seismic analysis of the feedwater system will account for the effects of attached non-safety piping systems, including the CUW water system and the AFI piping. This piping seismic analysis is performed according to the requirements identified in the ABWR DCD, Tier 1, Section 3.3, the associated design ITAAC provided in Table 3.3, Items 1 through 3, and the seismic analysis methods identified in Tier 2, Section 3.7.3. As identified above, adding AFI piping and tie-in to the CUW system is within the scope of these existing analysis requirements for the piping design ITAAC. These requirements ensure that any effects of the nonsafety-related AFI piping on ASME Class 1, 2 and 3 piping are considered. Because the tie-in of the AFI line is to the nonsafety-related portion of the CUW lines, and consequently does not tie-in directly to a safety-related line, it is expected that the design basis of the original feedwater piping and supports will not be adversely affected by this added AFI tie-in line.

There is no DCD amendment application change required as a result of this RAI.

RAI 03.08.04-4 Revision 1**QUESTION**

Several sections of Attachment 1 to the STPNOC's letter dated June 30, 2009 list replacements of nonrated, 3-h fire resistant or a non-fire rated doors with 5-psid door or two 3-hour rated fire doors (refer to Sections 9A.4.1.3.7, 9A.4.1.4.3, 9A.4.1.4.8, 9A.4.1.5.1, 9A.4.1.5.5, 9A.4.1.6.1, 9A.4.1.6.43 and 9A4.1.7.2). Please discuss and confirm that the above noted changes and additions of doors as well as their resulting structural configuration changes were evaluated (including wall structural integrity analyses, as needed) to ensure that the changes are bounded within their original structural design basis, and the affected walls will continue to maintain their structural integrity and perform their intended safety functions.

REVISED RESPONSE:

This revised response incorporates NRC review comments received at the NRC AIA audit at ANATECH from May 17 - May 21, 2010. Changed portions from the previous response are noted with a revision bar in the margin.

The detailed structural analysis must be performed following completion of detailed design, which will include such details as reactor building internal wall location, wall dimensions, wall materials, the replacement of the 3-hour fire resistant or non-rated fire doors with 5-psid or two 3-hour rated fire doors, and any other changes resulting from the final fire hazards analyses. The interior wall structural analysis will be performed as part of the complete reactor building design in accordance with ABWR DCD, Tier 1, Subsection 2.15.10, the associated design ITAAC provided in Table 2.15.10, Item 10, and Tier 2, Appendix 3H.1. As identified above, the changes and additions of fire doors, as identified in the Appendix 9A markups for the DCD amendment application, are within the scope of these existing analysis requirements. These requirements ensure that the changes and additions of fire doors are considered in the structural design basis and evaluation of the design basis loads in accordance with ABWR DCD, Tier 1, Subsection 2.15.10.

There is no DCD amendment application change required as a result of this response.