



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



June 21, 2010

U7-C-STP-NRC-100152

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, "STP ABWR Aircraft Impact Assessment (AIA) Amendment Revision," dated June 17, 2010, U7-C-STP-NRC-100139.

This letter provides responses to the questions in Request for Additional Information (RAI) Letter Number 13 related to the application to amend the ABWR DCD Part 2, Tier 2, Section 19. This submittal completes the response to this RAI letter.

The attachments to this letter provide the following RAI responses:

19-14

19-15

No COLA changes are required as a result of these responses.

There are no commitments in this letter.

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

STI 32695718

Doc 1
MRO

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

Executed on 6/21/2010

A handwritten signature in black ink, appearing to read "Mark McBurnett", with a stylized flourish at the end.

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

lee

Attachments:

1. RAI 19-14
2. RAI 19-15

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

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RAI 19-14**QUESTION**

In the DCD amendment submittal, the applicant has not described all fire doors adequately. The applicant has described some doors as rated for 5psid overpressure. These doors should also be rated as 3-hour fire rated doors to meet the existing Fire Protection Program and fire hazards analysis requirements, as well as the guidance in NEI 07-13. In addition, proper identification and adequate description of these design features are required by 10 CFR 50.150. NRC staff requests the applicant to revise the DCD to indicate a 3-hour fire rating for those 5psid doors identified under NEI 07-13. The staff and the applicant have had discussions dating back to January 27, 2010 in which the following DCD statement was discussed "...either a 5-psid door or two 3-hour rated fire doors..." The staff does not think this option provides an adequate description of the design feature required. The applicant should decide which option to be certified within the DCD. Proper identification and adequate description of these design features are required by 10 CFR 50.150. For example, Room 512 within the DCD shows access from corridor A via a vestibule. The applicant appears to be replacing the non-rated fire door with a 3-hour fire rated door without describing the appropriate vestibule walls also having a 3-hour rating. NRC staff requests the applicant to revise the DCD by choosing one option for each situation.

RESPONSE:

The DCD amendment application for AIA was revised as documented in the referenced letter (U7-C-STP-NRC-100139, dated June 17, 2010). This revision addresses all of the issues identified in this RAI by completely revising Section 9A from the previous markup submitted in Revision 1 of the DCD amendment application submittal for AIA. Please refer to Section 9A in the Reference.

RAI 19-15**QUESTION**

During the review of DCD amendment submittal, the NRC staff discovered an issue related to the NEI 07-13, Rev. 7, Fire Spread Rule set. Specifically, the applicant specified only the pressure rating of fire doors within the barriers that the applicant was crediting for withstanding overpressure effects. The staff's position is that the entire barrier needs to be rated at least 5 psid when taking credit for a single barrier. This includes fire doors, penetration seals, hatches, etc. The basis for the staff's position is that an overpressure may damage the components of the credited 3-hour fire-rated barrier, allowing fire to propagate beyond the credited barrier and beyond the fire damage footprint. In addition, proper identification and adequate description of these design features are required by 10 CFR 50.150. NRC staff requests the applicant to state within the DCD the pressure rating of all barriers and barrier components identified under the one barrier option of the NEI 07-13 Fire Spread Rule set.

RESPONSE:

The DCD amendment application for AIA was revised as documented in the referenced letter (U7-C-STP-NRC-100139, dated June 17, 2010). This revision addresses all of the issues identified in this RAI by revising Section 9.5.1.1.3 to include additional information related to this RAI. Please refer to Section 9.5.1.1.3 in the Reference.