



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 2, 2010

Mr. Edward D. Halpin
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 – RELIEF REQUEST NOS.
VRR-01, PRR-01, PRR-02, AND PRR-03 FOR THE THIRD 10-YEAR
INSERVICE TESTING PROGRAM INTERVAL (TAC NOS. ME3515, ME3516,
ME3517, ME3518, ME3519, ME3520, ME3521, AND ME3522)

Dear Mr. Halpin:

By letter dated February 22, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100640120), STP Nuclear Operating Company (the licensee) submitted to Nuclear Regulatory Commission (NRC) its 10-year Inservice Testing (IST) program for third 10-year IST interval, for South Texas Project (STP), Units 1 and 2. The licensee's submittal included Relief Request Nos. VRR-01, PRR-01, PRR-02, and PRR-03. In its relief requests, the licensee requested NRC's authorization to use alternative examination or testing in place of certain requirements of the 2004 American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code). The licensee provided additional information in its letter dated June 16, 2010 (ADAMS Accession No. ML101750035).

The Code of record for the STP, Units 1 and 2, third 10-year IST program interval is the 2004 Edition of the OM Code. The IST program has been developed by the licensee in accordance with the requirements of the OM Code, 2004 Edition, with no addenda. The licensee stated that STP, Units 1 and 2, will comply with the limitations and modifications to the requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.55a(b) related to implementation of the 2004 OM Code. The licensee has elected to upgrade both operating units simultaneously and, by taking extensions, aligned the STP, Unit 2's third 10-year IST interval to commence in September 2010 to coincide with STP, Unit 1's IST interval. Thus the proposed third 10-year IST interval for STP, Units 1 and 2, would extend from September 25, 2010, through September 25, 2020.

The NRC staff has reviewed the licensee's submittals for its third 10-year IST program interval requests for authorization of alternatives as described in the relief requests VRR-01, PRR-01, PRR-02, and PRR-03. Based on that review, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(a)(3)(i), and is in compliance with the requirements in the OM Code. The NRC staff concludes that the proposed alternatives provide an acceptable level of quality and safety; and are acceptable. Accordingly, the NRC authorizes the use of the alternatives as requested in the licensee's relief

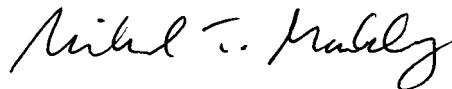
E. Halpin

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requests VRR-01, PRR-01, PRR-02, and PRR-03, for STP, Units 1 and 2, for the third 10-year IST program interval extending from September 25, 2010, through September 25, 2020.

A copy of the Safety Evaluation is enclosed. All other ASME Code requirements for which relief has not been specifically requested and approved remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Markley". The signature is fluid and cursive, with a large, stylized initial "M".

Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:
Safety Evaluation

cc w/encl: Distribution via Listserv



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001**

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO INSERVICE TESTING PROGRAM FOR THIRD 10-YEAR INTERVAL AND
RELIEF REQUESTS. PRR-01, PRR-02, AND PRR-03 and VRR-01
STP NUCLEAR OPERATING COMPANY

1.0 INTRODUCTION

By letter dated February 22, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100640120), STP Nuclear Operating Company (the licensee) submitted to Nuclear Regulatory Commission (NRC) its 10-year Inservice Testing (IST) program for third 10-year IST interval, for South Texas Project (STP), Units 1 and 2. The licensee's submittal included Relief Request Nos. VRR-01, PRR-01, PRR-02, and PRR-03. In its relief requests, the licensee requested NRC's authorization to use alternative examination or testing in place of certain requirements of the 2004 American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code). The licensee provided additional information in its letter dated June 16, 2010 (ADAMS Accession No. ML101750035).

The Code of record for the STP, Units 1 and 2, third 10-year IST program interval is the 2004 Edition of the OM Code. The IST program has been developed by the licensee in accordance with the requirements of the OM Code, 2004 Edition, with no addenda. The licensee stated that STP, Units 1 and 2, will comply with the limitations and modifications to the requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.55a(b) related to implementation of the 2004 OM Code. The licensee has elected to upgrade both operating units simultaneously and, by taking extensions, aligned the STP, Unit 2's third 10-year IST interval to commence in September 2010 to coincide with STP, Unit 1's IST interval. Thus the proposed third 10-year IST interval for STP, Units 1 and 2, would extend from September 25, 2010, through September 25, 2020.

2.0 REGULATORY EVALUATION

Title 10 of the Code of Federal Regulations (CFR), Part 50, Section 50.55a(f), "Inservice testing requirements," requires, in part, that ASME Class 1, 2, and 3 components must meet the requirements of the ASME OM Code and applicable addenda, except where alternatives have been authorized pursuant to paragraphs 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii).

When proposing alternatives, a licensee must demonstrate that the proposed alternatives provide an acceptable level of quality and safety or that compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The NRC

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would authorize alternatives to ASME OM Code requirements upon making necessary determinations under 10 CFR 50.55a.

The application of ASME code cases is addressed in 10 CFR 50.55a(b)(6) through reference to Regulatory Guide (RG) 1.192, "Operations and Maintenance Code Case Acceptability, ASME OM Code," Revision 0, dated June 2003, which lists acceptable and conditionally acceptable code cases for implementation in IST programs.

3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's relief request. The NRC staff's evaluation is provided below.

3.1 Valve Alternative Request VRR-01

The licensee has requested NRC authorization to use Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in LW [light water] Reactor Power Plants," in lieu of the stroke-time provisions specified in TSTC-5120 for MOVs as well as the position verification testing in ISTC3700. This code case allows motor-operated valves (MOVs) to be periodically exercised and diagnostically tested as an alternative to the OM Code stroke-time and position verification test requirements. The code of Record for STP, Units 1 and 2, third ten-year IST interval is the 2004 Edition of the OM Code. The Version of Code Case OMN-1 in the 2004 Edition of the OM states that, "the code case Expires on March 30, 2007." NRC authorization is required in accordance with 10 CFR 50.55a(a)(3) to use the version of Code Case OMN-1 in the 2004 Edition of the OM code beyond its stated expiration date.

The NRC staff has approved the use of Code Case OMN-1-1 in Regulatory Guide 1.192, "Operations and Maintenance Code Case Acceptability, ASME OM Code," Revision 0, dated June 2003. RG 1.192 currently approves the use of the version of Code Case OMN-1 that is in the 1999 Addenda of the OM Code/ The Licensees are allowed to use the 1999 version of the Code Case OMN-1 without submitting a request for an alternative. NRC Authorization is required in accordance with 10 CFR 50.55(a)(3) to use versions of Code Case OMN-1 other than the 1999 version. The Licensee has requested NRC Authorization to use the version of the Code Case OMN-1 that is in the 2004 Edition of the OM Code.

NRC Evaluation of Proposed Alternative

Application of code cases is addressed in 10 CFR 50.55a(b)(6) through reference to RG 1.192, Revision 0, which lists acceptable and conditionally acceptable code cases for implementation in IST programs. RG 1.192, Table 2, approves the use of Code Case OMN-1 (1999 Addenda) in lieu of provisions for stroke-time and position verification testing of MOVs in Subsection ISTC of the OM Code. Licensees are allowed the option of using Code Case (1999 Addenda) as an alternative to the OM Code requirements for MOV stroke-time and position verification testing. The NRC staff notes that there are no significant differences between the version of Code Case OMN-1 that is in the 1999 Addenda of the OM Code currently approved for use in RG 1.192, Revision 0, and the Revision 1 of the Code Case (OMN-1-1) in 2009 Edition of the OM Code.

There are recognized weaknesses in the stroke-time testing requirements for MOVs in the OM Code and the use of Code Case OMN-1-1 by a licensee resolves the weaknesses. Code Case OMN-1-1 permits licensees to replace stroke time and position verification testing of MOVs with a program of exercising MOVs every refueling outage (not to exceed 2 years) and diagnostically testing on longer intervals.

The NRC staff considers the proposed alternative to be acceptable because Code Case OMN-1-1 provides a superior method than the stroke-timing method required by the OM Code for assessing the operational readiness of MOVs. The NRC staff has recommended that licensees implement Code Case OMN-1 as an alternative to the MOV stroke-time and position verification testing provisions in the ASME Code. The NRC Staff also finds that there are no significant differences between the version of Code Case OMN-1 that is in the 1999 Addenda of the OM Code currently approved for use in RG 1.192 and the version of Code Case OMN-1 in the 2004 Edition of the OM Code.

Conclusion

The NRC Staff concludes that the licensee has adequately demonstrated that the alternative provides an acceptable level of quality and safety, addresses all the regulatory requirement set forth in 10 CFR 50.55a(a)(3)(i), and is in compliance with the ASME OM Code's Requirements. Based on the above discussion, the NRC staff concludes that the alternative in request VRR-01 is acceptable for STP, Units 1 and 2.

3.2 Pump Alternative Request PRR-01

The licensee has requested NRC authorization to use ASME Code Case OMN-18, "Alternative Testing Requirements for Pumps Tested Quarterly Within ± 20 percent of Design Flow," with the exception that a more limiting upper bound Acceptable Range value of 1.06 versus 1.10 for flow and differential pressure will be used.

The initial version of the Code Case OMN-18 is in the 2009 Edition of the OM Code. The Code Case allows the Licensee not to perform the instruments accuracy required for the comprehensive pump test. The licensee proposes to perform a quarterly Group A test in lieu of performing a biennial comprehensive pump test, utilizing the acceptance criteria associated with the Group A test. This code case has not yet been approved for use by NRC in RG 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code, "June 2003.

The licensee requested relief for NRC authorization to use Code Case OMN-18 of the IST for the following pumps:

Pump	Description	Class
3S141(2)MPA01	Auxiliary Feedwater Pump	3
3S141(2)MPA02	Auxiliary Feedwater Pump	3
3S141(2)MPA03	Auxiliary Feedwater Pump	3
3S141(2)MPA04	Auxiliary Feedwater Pump	3

Pump	Description	Class
3R201(2)NPA1(2)01A	Component Cooling Water Pump	3
3R201(2)NPA1(2)01B	Component Cooling Water Pump	3
3R201(2)NPA1(2)01C	Component Cooling Water Pump	3
3V111(2)VPA004	Essential Chilled Water Pump	3
3V111(2)VPA005	Essential Chilled Water Pump	3
3V111(2)VPA006	Essential Chilled Water Pump	3
3R281(2)NPA1(2)01A	Essential Cooling Water Pump	3
3R281(2)NPA1(2)01B	Essential Cooling Water Pump	3
3R281(2)NPA1(2)01C	Essential Cooling Water Pump	3
3R211(2)NPA1(2)01A	Spent Fuel Pool Cooling Pump	3
3R211(2)NPA1(2)01B	Spent Fuel Pool Cooling Pump	3

The proposed alternative will provide more consistent trend results when comparing subsequent tests or test results in the aggregate because all tests are performed at the same flow and instrument accuracy. Deviations from actual pump performance indicative of impending degradations will be more easily recognized, and declaring pumps inoperable for reasons other than actual equipment degradation can be avoided.

Subsection ISTB of the OM Code requires pumps to be tested quarterly (Group A or B test) and biannually (comprehensive pump test). More accurate instrumentation is required for the biannual pump test than for the quarterly pump test. This can cause problems with trending because data obtained during tests with more accurate instrumentation are not always comparable with data obtained during the quarterly tests.

ISTB-3400, "Frequency of Inservice Tests," of the OM Code states that, "an inservice test shall be run on each pump as specified in Table ISTB-3400-1. This table requires a Group A or Group B test to be performed quarterly and a Comprehensive test to be performed biennially.

Table ISTB-3400-1, "Inservice Test Frequency," of the OM Code requires that, "Group A and Group B tests to be performed quarterly and a comprehensive pump test to be performed biennially."

NRC Evaluation of Proposed Alternative

The licensee is proposing to perform IST for all the pumps listed above in accordance a modified Group A test procedure Code Case OMN-18 with the exception a more limiting upper bound Acceptable Range value 1.06 versus 1.10, flow, and differential pressure will be used. This Code Case has not yet been approved by the NRC in RG 1.192. The licensee has proposed to use this alternative for pumps with full flow testing capability.

The ASME OM Code requires that for Group A pumps, a Group A test be performed every quarter, and a comprehensive test be performed biennially. The Group A test is performed within $\pm 20\%$ of the pump design flow rate and the pressure instrument accuracy is $\pm 2\%$, and

the upper limit for the acceptable range for flow rate and differential pressure is 110% of the reference values. There is no Alert Range for the Group A test. The comprehensive test is performed within $\pm 20\%$ of the pump design flow rate, the pressure instrument accuracy is $\pm \frac{1}{2}\%$, and the upper limit of the Acceptable Range for flow rate and differential pressure is 103% of the reference values. The upper limit of the Alert Range for flow rate is 94% of the reference values, and of differential pressure for the comprehensive test is 94% of the reference values. Vibration monitoring is performed during both the Group A test and comprehensive test.

The licensee proposes that for Group A pumps, a modified quarterly test be performed every quarter, and the biennial comprehensive test not be performed. The modified Group A quarterly test would be performed within $\pm 20\%$ of the pump design flow rate, using the more accurate pressure instrumentation that is required for a comprehensive test ($\pm \frac{1}{2}\%$ instead of $\pm 2\%$). This modified quarterly test would replace the comprehensive test. The Acceptable Range for the modified Group A quarterly test is narrower than the Acceptable Range for the Group A quarterly test.

The licensee will use a more limiting upper bound of 106% for the Acceptable Range for the Acceptable Range for flow and differential pressure in lieu of 110% that is required by the OM Code for Group A tests. Therefore, the pumps noted in the table above will be in the Required Action Range if they exceed 106% of the Acceptable Range for reference value of flow and differential pressure. This proposed upper bound of 106% is greater than the upper bound of 103% for the biennial comprehensive pump test.

The NRC staff considers the proposed alternative acceptable, because all all of the tests will be performed with pressure gauges with $\pm \frac{1}{2}\%$ accuracy. The elimination of the comprehensive pump test (with its more limiting Acceptable Range upper bound of 103%) is compensated for by using more accurate pressure gauges on every quarterly test. This will provide for better trending of pump performance. Instead of performing seven tests with pressure gauges with $\pm 2\%$ accuracy, and then performing the eighth test with pressure gauges with $\pm \frac{1}{2}\%$ accuracy, all eight tests will be performed with the same $\pm \frac{1}{2}\%$ accurate gauges.

Conclusion

Based on the above evaluation, the NRC staff concludes that the licensee's proposed alternative to the Code Group A testing requirements for the pumps listed above provides an acceptable level of quality and safety and is acceptable pursuant to 10 CFR 50.55a(a)(3)(i), on the basis that the alternative provides an acceptable level of quality and safety.

3.3 Pump Alternative Request PRR-02

The licensee has requested authorization to use ASME Code Case OMN-16, "Use of a Pump Curve For Testing." This code case allows the use of pump curves for pump IST when it is impractical to adjust a centrifugal or vertical line shaft pump to a specific reference value.

Section ISTA-3130, "Application of Code Cases," ISTA-3130(b) of the 2004 Edition of the OM Code states that, "Code Cases shall be applicable to the edition and addenda specified in the test plan." The Code of Record for STP, Units 1 and 2, third ten-year IST interval, is the 2004

Edition of the OM Code. The initial version of Code Case OMN-16 is in the 2006 Addendum of the OM Code and is compatible with the 2004 Edition of the OM Code. The NRC staff has not approved the the use of Code Case OMN-16 in RG 1.192, Revision 0, RG 1.192 Revision 0, presently approves the use of code cases up through the 2001 Edition of the OM Code. The licensee requires NRC authorization in accordance with 10 CFR 50.55a(a)(3) to use Code Case OMN-16.

The licensee requested relief to use Code Case OMN-16 for the IST for the following pumps:

Pump	Description	Class
3R281(2)NPA1(2)01A	Essential Cooling Water Pump	3
3R281(2)NPA1(2)01B	Essential Cooling Water Pump	3
3R281(2)NPA1(2)01C	Essential Cooling Water Pump	3

The licensee stated that, the conditions imposed on OMN-9, "Use of Pump Curve for Testing as stated in RG1.192, Revision 0, has been incorporated in Code Case OMN-16.

NRC Evaluation of Proposed Alternative

Application of code cases is addressed in 10 CFR 50.55a(b)(6) through reference to RG 1.192, which lists acceptable and conditionally acceptable code cases for implementation in IST programs. RG 1.192, Table 2, conditionally approves the use of Code Case OMN-9. Licensees are allowed to use Code Case OMN-9 as an alternative to the OM Code requirements for pump IST without obtaining NRC authorization in accordance with 10 CFR 50.55a(3). The NRC has reviewed Code Case OMN-16 and agrees with the licensee that the conditions imposed on OMN-9 as stated in RG 1.192 have been incorporated in Code Case OMN-16.

The NRC staff considers Code Case OMN-16 to be an acceptable method for assessing the operational readiness of pumps, and is consistent with the staff position in RG 1.192 that conditionally approved the use of Code Case OMN-9.

Conclusion

Based on the above evaluation, the NRC staff concludes that the licensee's proposed alternative to the OM Code testing requirements for the pumps listed above is acceptable pursuant to 10 CFR 50.55a(a)(3)(i), on the basis that the alternative provides an acceptable level of quality and safety. The licensee's proposed alternative provides reasonable assurance of the operational readiness of the pumps listed above

3.4 Pump Alternative Request PRR-03

The licensee has requested NRC authorization to increase the Group A inservice test interval for the residual heat removal (RHR) pumps from every 3 months (quarterly) to every 6 months. Table ISTB-3400-1, "Inservice Test Frequency," of the 2004 Edition of the OM Code requires that a Group A pump test be performed quarterly.

The licensee has proposed an alternative to the Group A quarterly test interval requirement in Table ISTB-3400-1 for the following pumps:

Pump	Description	Class
2R161(2)NPA1(2)01A	RHR Pump A	2
2R161(2)NPA1(2)01B	RHR Pump B	2
2R161(2)NPA1(2)01C	RHR Pump C	2

The licensee stated that STP, Units 1 and 2, have three RHR pump trains used only for long-term cooldown events following auxiliary feedwater operations. STP, Units 1 and 2, are unique in the design of its RHR system. Whereas other plants have two trains of RHR, STP, Units 1 and 2, have three trains of RHR. The RHR system does not serve the low head safety injection function, and is therefore, not critical to the immediate accident mitigation function. Less emphasis should be placed on the quarterly testing of these pumps at power due to the RHR system negligible impact on core damage frequency and large early release frequency.

The licensee referenced the NRC safety evaluation in NRC letter "Issuance of Amendment Nos. 59 and 47 to Facility Operating License Nos. NPF-76 and NPF-80 and Related Relief Request – South Texas Project, Units 1 and 2 (TAC Nos. M76048 and M76049)" (ADAMS Accession No. ML021300134), dated February 17, 1994, for the explanation of defense-in-depth philosophy and how the alternative maintains sufficient safety margins. The licensee stated that the results of the review in the safety evaluation dated February 17, 1994, indicate that the proposed changes in the RHR pump surveillance interval represent an insignificant change in system unavailability, and no change in core damage frequency. The RHR system, including the RHR pumps, continue to be used as designed with no change in function or performance. The risk metrics for the RHR pumps remain consistent with the values used in the original risk analysis.

The licensee stated that the performance measure strategies for monitoring the proposed alternative in PRR-03 include a Group A IST run on each RHR pump nominally every 6 months during normal plant operation. A Comprehensive test on each RHR pump will be performed every two years.

NRC Evaluation of Proposed Alternative

The NRC stated in its letter dated February 17, 1994, that the licensee proposed to change technical specifications (TSs) to extend the RHR pump surveillance test interval to 6 months. However, the licensee withdrew this TS proposal because the NRC staff recognized that relief from the quarterly ASME Code test requirements was needed before the changes could be allowed to the RHR pump IST interval. The licensee subsequently requested, in Relief Request (RR) -11 (Unit 1) and RR-12 (Unit 2), NRC authorization to increase the IST interval for the RHR pumps, from every 3 months to every 6 months. The NRC safety evaluation that originally authorized RR-11 and RR-12 is also contained in the February 17, 1994 letter.

The NRC safety evaluation for RR-11 and RR-12 stated that STP, Units 1 and 2, is unique in the design of the RHR system. Whereas two trains are normally installed for redundancy to

ensure availability of at least one train, STP, Units 1 and 2, have three trains of RHR. The licensee's analysis in the February 17, 1994, letter was reviewed by the NRC with assistance of Brookhaven National Laboratory to check the licensee's 3-train analysis for the percent change in system unavailability and core damage frequency. The results of the review indicated that the licensee's proposed change in the RHR pump IST interval represents an insignificant change in system unavailability and no change in core damage frequency.

RG 1.175, "An Approach for Plant-Specific, Risk-Informed Decision-Making: Inservice Testing," August 1998, describes an acceptable alternative approach for applying risk insights from probabilistic risk assessment, in conjunction with established traditional engineering information, to make changes to a nuclear power plant's IST programs. The approach described in RG 1.175 addresses the high-level safety principles specified in RG 1.174, "An Approach For Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes To The Licensing Basis," Revision 1, November 2002, and attempts to strike a balance between defining an acceptable process for developing risk-informed IST programs without being overly prescriptive. It is intended that the approach presented in RG 1.175 should be regarded as an example of acceptable practice, and that licensees should have some degree of flexibility in satisfying regulatory requirements on the basis of their accumulated plant experience and knowledge.

ASME Code Case OMN-3, "Requirements for Safety Significance Categorization of Components Using Risk Insights for Inservice Testing of LWR Power Plants," is conditionally approved for use in RG 1.192, Revision 0. The provisions in Code Case OMN-3 allow extension of the test interval for pumps in the IST program provided certain criteria are met. The licensee did not use Code Case OMN-3 for this alternative because applying Code Case OMN-3 to the RHR pumps test frequency would result in internally inconsistent risk-ranking classifications.

Although the risk-ranking methodology used by the licensee is not the same risk-ranking methodology used in Code Case OMN-3 that was conditionally approved by the NRC, the alternative in PRR-03 is similar to the criteria in Code Case OMN-3 for extending the test intervals for components in the IST program. The NRC considers the proposed alternative to be acceptable because it is consistent with defense-in-depth philosophy, safety margin, and performance monitoring strategies as discussed in RG 1.175.

4.0 CONCLUSION

As set forth above, the NRC staff has determined that the alternatives in Relief Requests VRR-01, PRR-01, PRR-02, and PRR-03 are acceptable for STP, Units 1 and 2. Accordingly, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(a)(3)(i), and is in compliance with the requirements in the OM Code.

Accordingly, the NRC staff authorizes the alternatives proposed in Relief Requests VRR-01, PRR-01, PRR-02, and PRR-03 for STP, Units 1 and 2, for the proposed 3rd 10-year IST interval. The authorization is based on the conclusion that the proposed alternatives provide an acceptable level of quality and safety. All other OM Code requirements for which an alternative was not specifically requested and authorized remain applicable.

Principal Contributor: S. Tingen

Date: September 2, 2010

E. Halpin

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requests VRR-01, PRR-01, PRR-02, and PRR-03, for STP, Units 1 and 2, for the third 10-year IST program interval extending from September 25, 2010, through September 25, 2020.

A copy of the Safety Evaluation is enclosed. All other ASME Code requirements for which relief has not been specifically requested and approved remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Sincerely,

/RA/

Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:
Safety Evaluation

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