~~PROPRIETARY~~

Nuclear Operating Company

South Texas Project Electric Generating Station 4000 Avenue F – Suite A Bay City, Texas 77414

October 5, 2010
U7-C-STP-NRC-100222
10 CFR 2.390
10 CFR 52

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. 52-012 and 52-013
Submittal of Combined License Application Revision 4

STP Nuclear Operating Company (STPNOC) submits Revision 4 to the South Texas Project Units 3 & 4 (STP 3 & 4) Combined License Application (COLA) (Reference 1) as an enclosure to this letter. This letter contains attachments and enclosures providing the following:

Attachment 1 – "Affidavit for Withholding Proprietary Information under 10 CFR 2.390," on behalf of Nuclear Innovation North America (NINA).

Attachment 2 – "Summary of Preflight Evaluations," checks performed on the PDF files for each Part included with this submittal (Enclosures 1 and 2).

Attachment 3 – "Summary of Commitments," completed, revised, or added (new).

Attachment 4 – "Summary of Changes" incorporated into Revision 4 to the COLA (References 2 through 10).

Attachment 5 – "List of RAI Responses with Changes to the COLA," NRC staff Requests for Additional Information (RAI) which required changes to the COLA in the responses, incorporated as of Revision 4.

Enclosures (2) – Two DVDs containing Revision 4 to the COLA in PDF format, prepared in compliance with "Guidance for Electronic Submissions to the NRC." Each DVD contains a packing slip that explains the contents.

D091
NRC

STI: 32761255

Enclosure 1 (DVD) provides a complete, non-proprietary and non-security-sensitive version of the STP 3 & 4 COLA suitable for public disclosure.

Enclosure 2 (DVD) provides a complete proprietary version of the STP 3 & 4 COLA and includes the proprietary and Security Sensitive information.

The information in Part 2, Tier 2 Table 1.8-21 regarding the applicability of certain industry codes and standards to digital instrumentation and controls systems and electrical systems is clarified in a revised response to RAI 07.01-14 in Reference 11, which is not included in this COLA revision.

The affidavit submitted with Reference 12 requesting that proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390 remains applicable to the proprietary figures contained in Part 10.

No additional changes to Part 4, FSAR Chapter 16 or the Departures Report for Technical Specifications have been made since the submittal of Reference 13.

A summary of commitments is provided in Attachment 3.

Upon separation from Enclosure 2 (Proprietary Information), this letter is decontrolled.

If there are any questions regarding this submittal, please contact me at (361) 972-7206, or Bill Mookhoek at (361) 972-7274.

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

Executed on 10/5/10

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

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Attachments: As stated

Enclosures:
1. DVD, South Texas Project Units 3 & 4 COLA Rev. 04, Non-Proprietary
2. DVD, South Texas Project Units 3 & 4 COLA Rev. 04, Proprietary

References:

1. Letter, M. A. McBurnett to Document Control Desk, "Combined License Application," dated September 20, 2007, ABR-AE-07000004 (ML072830407)
2. Letter, Scott Head to Document Control Desk, "Revised Response to Request for Additional Information, " dated May 3, 2010, U7-C-STP-NRC-100094 (ML101250480)
3. Letter, Scott Head to Document Control Desk, "ABWR STP Aircraft Impact Assessment (AIA) Amendment Revision 2," dated September 2, 2010, U7-C-STP-NRC-100202.
4. Letter, Scott Head to Document Control Desk, "Revised COLA Part 9 ITAAC," dated August 24, 2010, U7-C-STP-NRC-100197.
5. Letter, Mark McBurnett to Document Control Desk, "Proposed Revision to Environmental Report," dated November 11, 2009, U7-C-STP-NRC-090201 (ML093200201)
6. Letter, Scott Head to Document Control Desk, "Additional Information Regarding Draft Environmental Impact Statement," dated July 7, 2010, U7-C-STP-NRC-100162 (ML101930157)
7. Letter, Scott Head to Document Control Desk, "Proposed Revision to Environmental Report," dated November 10, 2009, U7-C-STP-NRC-090195 (ML093170197)
8. Letter, Kenny Jaynes to Russell Kiesling, "SWG-2007-786; South Texas Project Nuclear Operating Company, Units 3 & 4, Preliminary Jurisdictional Determination, Wadsworth, Montgomery County, Texas," dated May 14, 2009 (ML091350101)
9. Letter, Scott Head to Document Control Desk, "Response to Requests for Additional Information, " dated June 15, 2009, U7-C-STP-NRC-0900056 (ML091690066)
10. Letter, Mark McBurnett to Document Control Desk, "Revised Response to Request for Additional Information, " dated April 19, 2010, U7-C-STP-NRC-100065 (ML101120084)
11. Letter, Mark McBurnett to Document Control Desk, "Revised Response to Request for Additional Information, " dated September 23, 2010, U7-C-STP-NRC-100214
12. Letter, Mark McBurnett to Document Control Desk, "Submittal of Combined License Application Revision 2," dated September 24, 2008, ABR-AE-08000073 (ML082830938).
13. Letter, Mark McBurnett to Document Control Desk, "Advance Proposed Submittal of Technical Specification Changes," dated July 28, 2010, U7-C-STP-NRC-100177 (ML102160635).

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

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CPS Energy

ATTACHMENT 1

AFFIDAVIT FOR WITHHOLDING PROPRIETARY INFORMATION UNDER 10 CFR 2.390

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter			
	)		
	)		
STP Nuclear Operating Company	)	Docket Nos.	52-012
	)		52-013
South Texas Project Units 3 & 4			
	)		

AFFIDAVIT

I, Bruce Chung, Chief Financial Officer for Nuclear Innovation North America LLC ("NINA"), Nuclear Innovation North America Investments Holdings LLC ("NINA Holdings"), Nuclear Innovation North America Investments LLC ("NINA Investments"), NINA Texas 3 LLC ("NINA 3") and NINA Texas 4 LLC ("NINA 4"), hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of NINA, NINA Holdings, NINA Investments, NINA 3, and NINA 4.

2. NINA 3 and NINA 4 are providing information to support the application for a Combined License for STP Units 3 & 4. The information being provided is located in Part 1 of the application and contains legal and financial information related to the ownership of STP Units 3 & 4. The application also contains proprietary commercial and financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR2.390(a)(4), because:

    i. This information is and has been withheld in confidence by NINA 3, NINA 4 and their affiliates.

    ii. This information is of a type that is customarily held in confidence by NINA 3, NINA 4 and their affiliates, and there is a rational basis for doing so because the information contains sensitive legal and financial information concerning financing arrangements, project cost, and operating expenses of NINA 3 and NINA 4.

    iii. This information is being transmitted to the NRC voluntarily, in confidence and under the provisions of 10 CFR2.390(a)(4) and it is to be received in confidence by the NRC.

    iv. This information is not available in public sources and could not be gathered readily from other publicly available information.

v. Public disclosure of this information would create substantial harm to the competitive position of NINA 3, NINA 4 and their affiliates by disclosing internal financial information.

3. The proprietary information related to the application is shown in Part 1 Tables 1.3-1, 1.3-2, 1.3-3 and 1.3-4 as provided in the attachment to this Affidavit and has been appropriately marked as proprietary.

4. The information has substantial commercial value. The information requested to be withheld reveals commercially valuable and sensitive information and information about financing arrangements. Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of NINA 3 and NINA 4, NINA Investments, NINA Holdings and NINA itself because it would enhance the ability of competitors to gain knowledge of our costs and our commercial strategies.

5. Accordingly, NINA 3 and NINA 4 request that the designated portions of the COLA be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4).

Bruce Chung
Chief Financial Officer
Nuclear Innovation North America LLC
Nuclear Innovation North America Investments Holdings LLC
Nuclear Innovation North America Investments LLC
Nuclear Innovation North America Texas 3 LLC
Nuclear Innovation North America Texas 4 LLC

STATE OF NEW YORK)
)
COUNTY OF NEW YORK)

Subscribed and sworn to before me, a Notary Public in and for the State of New York, this 27th day of April, 2010.

SIOBHAN BRIDGET BRADY
NOTARY PUBLIC STATE OF NEW YORK
NEW YORK COUNTY, LIC. #01BR6219654
COMMISSION EXPIRES 3/29/2014

Notary Public in and for the State of New York

ATTACHMENT 2

SUMMARY OF PREFLIGHT EVALUATIONS

All submittal PDF files were prepared with Adobe Acrobat Version 8 using the current Job Options file provided by the NRC on its web site. All files passed the preflight check (using the latest NRC preflight profile provided on its web site) except a few files that contained scanned pages that were processed by the Acrobat Optical Character Recognition (OCR) process. In these cases, an error is generated for lack of embedded fonts in the files. This is due to the known and documented inability of Acrobat to embed the fonts in a scanned and OCR processed file.

SUMMARY OF COMMITMENTS

The following table provides a summary of commitments completed, revised, or added in Revision 4 to the COLA.

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Part 2			
Section 4.4.3.3.1 (COM 4.4-1)	Power Flow Operating Map	One Year Prior to Fuel Load	Completed
Section 4.4.3.3.1 (COM 4.4-2)	Thermal Limits	One Year Prior to Fuel Load	Completed
Section 6.1 (COM 6.1-1)	Site Dependent Materials for Reactor Building Cooling Water Heat Exchanger and Reactor Service Water pump and valves	Prior to Pre-Operational Testing	Completed
Section 6.3.3 (COM 6.3-1)	ECCS Performance Results	One Year Prior to Fuel Load	Completed
Section 6.3.3.7.3 (COM 6.3-3)	Limiting Break Results	One Year Prior to Fuel Load	Completed
Appendix 6C (COM 6C-1)	Evaluation of strainer bypass on downstream components (pumps, valves etc.)	One Year Prior to Fuel Load	New
Section 9.1.6.6 (COM 9.1-3)	Heavy load handling program procedures will be part of the Plant Operating Procedure Development Plan and Crane descriptions will be added in FSAR Amendment	Prior to receipt of fuel	Revised
Section 9.2.15.2.1 (COM 9.2-1)	Reactor building Cooling Water Safety Design Bases (Interface Requirements	Before installation of equipment	Revised
Section 9.2.17.1 (COM 9.2-2)	HECW System Refrigerator Requirements will be included in procurement documents	Procurement	Revised
Section 9.5.13.10 (COM 9.5-10)	HVAC Pressure Calculations	During detailed design	Revised
Section 9.5.13.10 (COM 9.5-17)	HVAC Pressure differential preoperational testing	Prior to fuel load	Revised

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Section 9.5.13.20 (COM 1C-1)	Operating Procedures for Station Blackout	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 10.2.5.1 (COM 10.2-1)	Low Pressure Turbine Disk Fracture Toughness	After procurement and prior to initial fuel load	Revised
Section 15.0.4.5 (COM 15.0-1)	Anticipated Occupational Occurrences	One Year Prior to Fuel Load	Completed
Section 15.0.4 (COM 15.0-2)	Operating Limits	One Year Prior to Fuel Load	Completed
Section 15.1 thru 15.8 (COM 15.0-3)	Design Basis Accidents	One Year Prior to Fuel Load	Completed
Section 15.1.2.3.2.2 (COM 15.1-1)	Feedwater Controller Failure Maximum Demand	One Year Prior to Fuel Load	Completed
Section 15.2.1.3.1 (COM 15.2-1)	Inadvertent Closure of One Turbine Control Valve	One Year Prior to Fuel Load	Completed
Section 15.2.2.3.2.3 (COM 15.2-2)	Generator Load Rejection with Failure of All Bypass Valves	One Year Prior to Fuel Load	Completed
Section 15.4.7.3 (COM 15.4-1)	Mislocated Fuel Bundle Accident	One Year Prior to Fuel Load	Completed
Section 15.4.8.3 (COM 15.4-2)	Misoriented Fuel Bundle Accident	One Year Prior to Fuel Load	Completed
Section 17.4S.1 (COM 17.4-1)	Design Reliability Assurance Program Expert Panel	By third quarter of 2011	New
Section 19.4S.1.1 (COM 19.4S-1)	Develop procedures that control the development and maintenance of the as-designed, as-to-be-built, plant-specific PRA that will be used during the construction phase of STP 3 & 4.	April 2011	Revised
Section 19.4S.1.2 COM 19.4S-2	Plant walk downs are performed to support PRA model development	December 2011	Revised
Section 19.4S.1.2 COM 19.4S-3	PRA model maintenance and update procedures are in place	December 2011	Revised

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Section 19.9.1 (COM 19.9-1)	Operating procedure is developed for post-accident recovery from a Reactor Water Cleanup System break	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.2 (COM 19.9-2)	Emergency Operating Procedures address operating Reactor Water Cleanup System in heat exchanger bypass mode	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.3 (COM 19.9-3)	An Emergency Operating Procedure for severe external flooding is developed including: Observation of the main cooling reservoir; unobstructed views of the main cooling reservoir (MCR); flood barriers in place for dam failure upstream, and; periodic inspections of the MCR.	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.4 (COM 19.9-4)	(2) HCLPF values for site-specific SSCs (UHS/Pump House structure, Cooling Tower, RSW Piping Tunnel, and Diesel Generator Oil Storage Vault) whose failure may affect the plant response to seismic events and which are not included in the analyses described in Appendix 19H will be established	September 2010	Revised

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
	(4) The system model (seismic accident sequences) developed in the DCD will be updated to incorporate capacity reductions due to site-specific effects (soil liquefaction) and site-specific SSCs (Ultimate Heat Sink (UHS), including Reactor Service Water (RSW) Pumphouse, Cooling Tower, RSW Piping Tunnel, and Diesel Generator Oil Storage Vault). Then, it will be determined whether site-specific soil failures control the seismic HCLPF capacities of SSCs associated with the seismic accident sequences. Based on the result of the update, the sequence- and plant-level seismic HCLPF capacity will be determined.	Prior to fuel load	Revised
Section 19.9.5 (COM 19.9-5)	Procedures for walk downs to identify fire, seismic, and internal flooding vulnerabilities are developed	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.7 (COM 19.9-6)	Procedures and training are in place for the AC independent water addition system	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.8 (COM 19.9-7)	Procedures are developed to ensure common mode failures in the essential communications function cannot occur	Consistent with the plant operating procedure development plan in Section 13.5.	Revised

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Section 19.9.9 (COM 19.9-8)	Analyses and procedures to confirm PRA assumptions are in place	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.10 (COM 19.9-9)	Training, design, site-specific PRA procedures to reduce internal flooding risk	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.11 (COM 19.9-10)	Operating procedures to avoid loss of decay heat removal capability during shutdown	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.12 (COM 19.9-11)	Operating procedures and training are in place for Reactor Core Isolation Cooling System operation outside the Main Control Room	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.13 (COM 19.9-12)	Plans are developed to identify departures of test and surveillance intervals from assumptions in the PRA	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.14 (COM 19.9-13)	Important operator actions are reflected in operating procedures and training	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.15 (COM 19.9-14)	Procedure is available for manual operation of motor operated valves	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.16 (COM 19.9-15)	Procedures to verify locked-open position of High Pressure Core Flooder System discharge valve	Consistent with the plant operating procedure development plan in Section 13.5.	Revised

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Section 19.9.17 (COM 19.9-16)	Acceptance Criteria for ITAAC 2.14.1.2 confirms the existence of an ASME Code Certified Stress Report for the containment pressure boundary components. The containment isolation valves are considered pressure boundary components, and are included in the separate ASME Code Certified Stress Reports. The Certified Stress Reports for the containment isolation valves will include the stress analysis for the severe accident conditions of 0.77 MPa and 260 °C (500 °F).	Prior to Fuel Load	Revised
Section 19.9.18 (COM 19.9-17)	Operating procedures will be in place to ensure drywell purge/sample valves are in the correct state and motive power to the purge valves is removed	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.19 (COM 19.9-18)	Operating procedures to manually transfer the Combustion Turbine Generator (CTG) power to the Condensate and Condensate Booster Pumps and their support systems will be developed	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.20 (COM 19.9-19)	Procedure to swap Reactor Building Cooling Water and Reactor Service Water pumps and heat exchangers at least monthly is in place	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.21 (COM 19.9-20)	It will be confirmed that the building housing the AC independent water addition system can withstand site-specific external events	Prior to Fuel Load	Revised
Section 19.9.22 (COM 19.9-21)	Procedures to align nitrogen bottles for Safety Relief Valves are developed	Consistent with the plant operating procedure development plan in Section 13.5.	Revised

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Section 19.9.23 (COM 19.9-22)	Procedure for administrative control of freeze seals is developed	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.24 (COM 19.9-23)	Administrative procedure to control combustibles and ignition sources is in place	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.29 (COM 19.9-27)	Plant procedures are in place to maintain important safety functions during shutdown including control rod drive and reactor internal pump maintenance activities	Consistent with the plant operating procedure development plan in Section 13.5.	Revised
Section 19.9.2 (COM 19.9-28)	An evaluation of CUW operation in the Heat Removal Mode will be completed	Prior to Fuel Load	New Commitment
Section 19.9.21 (COM 19.9-29)	The building that houses the ACIWA equipment will be verified to have a seismic high confidence low probability of failure (HCLPF) acceleration value of at least 0.5g. The methodology for HCLPF acceleration calculations will be consistent with that described in DCD Section 19I.1 for the ABWR seismic margins analysis	Prior to Fuel Load	New Commitment

COLA Section (Commitment Number)	Commitment Summary	Milestone	Commitment Type
Section 19.9.14 (COM 19.9-30)	Strategies for primary containment flooding in the emergency procedure guidelines will incorporate generic industry guidance as necessary and use existing site specific design features to the extent possible to provide indication of and address flooding in the lower drywell when the lower drywell flooder: (1) does not operate, (2) does not operate as designed, (3) prematurely operates resulting in an inadvertent pool of water in the lower drywell, and (3) operates as designed during a severe accident scenario that involves a core melt and vessel failure.	Consistent with the plant operating procedure development plan in Section 13.5.	New Commitment
Section 19A.3.6 (COM 19A-1)	Operator experience will be incorporated into training and procedures prior to fuel load as described Sections 13.2.3 and 13.5.3, respectively.	Prior to Fuel Load	Revised
Section 19B.3.2 (COM 19B-1)	The inspection and test program for fiber optic-type isolators used between safety-related and non-safety-related systems and will be established consistent with the plant operating procedure development plan in Section 13.5.	Prior to Fuel Load	Revised
Section 19B.2.17 (COM 19B-2)	The required testing, inspection and replacement guidance will be developed consistent with the plant operating procedure development plan described in Section 13.5. Generic Issue A-47.	Prior to Fuel Load	New Commitment

SUMMARY OF CHANGES

The following table is a summary of changes incorporated into Revision 4 to the COLA.

Description of Change	**Reference (Refer to Cover Letter)**
Responses to NRC staff Requests for Additional Information (RAIs) which require a change to the COLA are incorporated, as listed.	Attachment 5
Changes to Part 1 supersede the revised response to RAI 1-1, and describe the updated ownership interests in STP 3 & 4. Effective March 1, 2010, NINA 3 owns a 92.375% undivided interest and CPS Energy owns a 7.625% undivided interest in STP 3, and NINA 4 owns a 92.375% undivided interest and CPS Energy owns a 7.625% undivided interest in STP 4. These ownership interests are subject to reallocation among the owners. NINA 3, NINA 4, and CPS Energy, through their agent STPNOC, will notify the NRC if there is a change in the allocation of ownership in either or both STP 3 and STP 4. In addition, Part 1 Section 1.5 includes a foreign ownership, control or domination (FOCD) negation action plan and mitigation efforts that will be in place prior to, during and after the construction period to assure that any foreign owners or investors are denied control or domination over all matters relating to safety, quality, security and reliability. NINA 3 and NINA 4 will also establish a nuclear advisory committee (NAC) to provide independent oversight throughout the design, construction and operation of STP 3 4 with respect to any matter relating to nuclear safety, quality, security or reliability. The NAC will provide transparency to the NRC and other U.S. Governmental Authorities regarding any potential for foreign control or domination.	Reference 2
Changes as a result of the Aircraft Impact Assessment (AIA) Amendment • Section 1.4 – Revised numbering to reflect AIA Amendment text and numbering convention • Figure 1.2-8 - Replaced this figure with Figure 1.2-8a and Figure 1.2-8b to reflect AIA Amendment change • Table 3.2-1 Classification Summary – revised numbering to reflect AIA numbering consistency • Figure 5.1-3 – Nuclear Boiler System PI&D (Sheet 4 of 11) – replaced base figure with AIA figure • Figure 9A.4-4 – Rx Building Fire Protection at Elevation 12300 mm – replaced base figure with AIA figure • Section 9.1.2.13 – Included SFL Lines thickness from AIA ("6.35 mm	Reference 3

Description of Change	**Reference (Refer to Cover Letter)**
thick") • Section 9A.4.1.4.8 – Revised paragraph to reflect AIA Amendment text	
Tier 1 Departure: STD DEP T1-1.1-1: Definition of As-Built Definition changed to be consistent with NEI 08-01, Rev. 4, Draft E.	
Changes to COLA Part 9, Section 5 as a result of Revisions to NUREG 0800, Section 14.3.12 "Physical Security- Inspections, Tests, Analyses, and Acceptance criteria" dated January 2010.	Reference 4

Part 3 Environmental Report:
• Conforming Changes from Revision 2
  ▪ 03.01
  ▪ 03.09S
• Contention-Related Revisions
  ▪ 02.03.01
  ▪ 04.04
  ▪ 05.02
  ▪ 05.04
  ▪ 07.05S
• DEIS-Review Revision
  ▪ 03.04
• U.S. Army Corps Jurisdictional Determination-Update
  ▪ 02.02
	References 5, 6, 7, and 8

RAI 07.01-4 identified a number of I&C-related discrepancies in the COLA where current departures were not implemented consistently throughout the FSAR. STPNOC committed to review the FSAR and correct all I&C related discrepancies. Confirmatory Item 07.01-4 tracks this commitment in Chapter 7 of the draft Safety Evaluation Report. The FSAR changes identified from this review are incorporated into COLA Revision 4. There are no new departures; all FSAR changes result from correcting consistency errors in applying existing departures.	References 9 and 10

LIST OF RAI RESPONSES WITH CHANGES TO THE COLA

The tables below provide NRC staff Requests for Additional Information (RAI) which require a change to the COLA in the response and are incorporated **as of Revision 4**.

RAI responses that require a change to the COLA and are not included in this table will be incorporated into the next routine revision to the COLA.

Table 1: Safety-Related RAI Responses

RAI Question No.	RAI Letter No.	Part	Section(s)
01-01	77	1	Various
		3	01.01, 05.08, 08.01
01-12	153	2	Tier 2, Tables 1.10S-1 and 1.10S-2
01-13	272	2	Tier 2, Table 1.9S-3
01-17	312	2	Tier 2, 1.2.2
02.03.01-23	217	2	Tier 1, Table 5.0 Tier 2, 2.3S.1.5, 2.3S.7, 2.3S.2.2.5, and Table 2.0-2
02.03.04-5 (NOTE)	63	2	Tier 2, 15.7.6.1, 15.2.10.1; Tables 12.2-20, 12.2-21, 15.7-14, and 15.7-11
02.03.04-9	217	2	Tier 2, Table 2.0-2
02.03.04-10	233	2	Tier 2, Table 2.3S-25
02.03.04-11	318	2	Tier 2, 2.0-2
02.03.05-11	217	2	Tier 2, 2.3S.5.1; Table 2.3S-26
		3	02.07
02.03.05-12	318	2	Tier 2, 2.3S.5.2
02.04.05-8	185	2	Tier 2, 2.4S.5.2.3.2
02.04.12-27	202	2	Tier 2, Figure 2.4S.12-23
		3	02.03.01, Figure 2.3.1-28
02.04.12-28 (NOTE)	202	2	Tier 2, 2.3.12, 2.4S.12, 2.4S.13 and Figures 2.4S.12-1 and 2.4S.12-18
		3	02.03.01
02.04.12-33 (NOTE)	202	2	Tier 2, 2.4S.12.3
02.04.12-35	202	2	Tier 2, Table 2.0-2; 2.4S.12.5; Figure 2.4S.12-32
02.04.12-36	202	2	Tier 2, 2.4S.12.1.6, 2.4S.12.3.3, 2.4S.12.6 and Table 2.4S.12-3
02.04.12-38 (NOTE)	333	2	Tier 2, 2.4S.12.2.4.1
		3	02.03.01

RAI Question No.	RAI Letter No.	Part	Section(s)
02.04.13-11	185	2	Tier 2, 2.4S.13.1.4 and Table 2.4S.13-3
02.04.13-12	185	2	Tier 2, 2.4S.13-1
02.04.13-13	185	2	Tier 2, 2.4S.13.2
02.04.13-14	185	2	Tier 2, 2.4S.13.2
02.05.01-18	127	2	Tier 2, 2.5S.1.2.6.4 and 2.5S.1.3
02.05.01-19	127	2	Tier 2, 2.5S.1.2.4.3
02.05.01-21	127	2	Tier 2, Figures 2.5S.1-44 and 2.5S.1-45, 2.5S.3.2.2.1 and 2.5S.3.4.1
02.05.01-22	317	2	Tier 2, 2.5S.1.2.4.3
02.05.01-23	317	2	Tier 2, 2.5S.3
02.05.02-19 (NOTE)	117	2	Tier 2, 2.5S.2 and 2.5S.4 and Figures 2.5S.2-39, 2.5S.2-41, 2.5S.2-43, 2.5S.2-45 and 2.5S.2-49a
02.05.02-23	202	2	Tier 2, 2.5S.2.5.4
02.05.02-24	202	2	Tier 2, Figures 2.5S.2-2, 2.5S.2-4, and 2.5S.2-5
02.05.02-25	202	2	Tier 2, Figures 2.5S.2-35a and 2.5S.4-57
02.05.02-28	317	2	Tier 2, 2.5S.2.4.3
02.05.02-29	317	2	Tier 2, Table 2.5S.2-7
02.05.02-30	317	2	Tier 2, 2.5S.4.7.2.2 and Table 2.5S.4-28
02.05.04-29 (NOTE)	202	2	Tier 2, 2.5S.4.10.3
02.05.04-30	202	9	3.0, Table 3.0-13
02.05.04-33 (NOTE)	304	2	Tier 2, 2.5S.4.5.3 and Table 2.5S.4.5.3-1
		9	3.0, Table 3.0-11
02.05.04-34	326	2	Tier 2, 2.5S.4.7.3.7
02.05.04-35	326	2	Tier 2, 2.5S.4.10.3 and Table 2.5S.4-41C
02.05.04-36	342	2	Tier 2, 2.5S.4.3, Tables 2.5S.4.5.3-1, 2.5S.4.5.3-2, 2.5S.4.5.3-2-3, and 2.5S.4.5.3-4, and Figures 2.5S.4-80 and 2.5S.4-81
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03.03.01-1	169	2	Tier 2, 2.0, 2.3S.1, 3.3
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05.03.02-1	81	2	Tier 2, 6C.3.2
05.03.03-1	216	7	2.1 (STD DEP T1 2.1-2)
05.04-2	222	2	Tier 2, 5.4.15.4
05.04.07-7	118	2	Tier 2, 5B.3
06.01.01-1 (NOTE)	123	2	Tier 2, 6.1.1.1.1, Table 6.1-1
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06.02.02-5	260	2	Tier 2, 6.2, 13.4S
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06.02.02-26 (NOTE)	395	2	Tier 2, 6C
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08.02-23 (NOTE)	294	2	Tier 2, 8.3.3.2.1S and 8.3.3.9S
08.02-24 (NOTE)	343	2	Tier 2, 8.3.3.9S and 8.3.3.2.1S
08.03.01-12 (NOTE)	129	2	Tier 2, 3I, Tables 3I-4 and 3I-14
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09.02.04-1	160	2	Tier 2, 9.2.4.2.2
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09.02.04-6 (NOTE)	163	2	Tier 2, 9.2.8.8; Table 3.0-3
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09.04.03-1	210	2	Tier 1, Table 5.0 Tier 2, Table 2.0-2
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09.05.01-11	344	2	Tier 2, 9E.1.8
09.05.01-2	150	2	Tier 2, 9.2.8.2
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09.05.01-7	150	2	Tier 2, 9.5.1.3.4 and 9.5.13.18
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09.05.03-1	146	2	Tier 2, 9.5.3.1.1
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12.03-12.04-11	291	2	Tier 2, 12.3.9
12.03-12.04-12	291	2	Tier 2, 11.4.2.2.2
12.03-12.04-13	292	2	Tier 2, 12.3.4.1, 12.3.7.2
12.03-12.04-14	292	2	Tier 2, 12.3.8
12.03-12.04-15	316	2	Tier 2, 12.3.7.3
12.03-12.04-2	143	2	Tier 2, 12.4
12.03-12.04-3	166	2	Tier 2, 11.2.1.2.4
12.03-12.04-4	166	2	Tier 2, 12.3.7.2
12.03-12.04-7	180	2	Tier 2, 12.3, Table 19.2-2
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12.05-4	145	2	Tier 2, 12.5S
12.05-5	291	2	Tier 2, 12.5.S 4.4
12.05-6	308	2	Tier 2, 12.5.3.2
13.01.01-6	133	2	Tier 2, 13.1.1.2
13.02.02-1	133	2	Tier 2, 13.4.5
13.05.01.01-1	133	2	Tier 2, 13.5.3.3.1
13.05.02.01-1	133	2	Tier 2, 13.5.3.2 (7)
13.05.02.01-2	133	2	Tier 2, 13.5.3.2 (2)
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14.02-10 (NOTE)	182	2	Tier 1, 2.2 Tier 2, 7.1S and 14.2
14.02-11 (NOTE)	182	2	Tier 2, 14.2
14.02-12	212	7	3.0 (STD DEP 14.2-1)
14.02-13	241	2	Tier 2, 14.2S.1
14.03-1	128	9	Tables 2.12.1, 2.12.12, 2.12.14 and 2.12.15
14.03.02-10	323	2	Tier 2, 3H
14.03.02-2	215	9	3.0, Tables 3.0-7 and 3.0-8
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14.03.05-6	258	2	Tier 1, 3.4
14.03.05-7	258	2	Tier 1, 3.4
14.03.06-5	128	9	Table 3.0-2
14.03.06-6	228	9	Table 3.0-2
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15.08-2 (NOTE)	285	2	Tier 2, 15E
15.08-3	314	2	Tier 2, 15A-29
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16-2	147	2, 4	Tier 2, 16.3.4.3, B3.4.3
		7	2.2 (STD DEP 7.3-12)
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16-4	154	2, 4	Tier 2, 16B3.5.1, B3.8.1, B3.8.4, B3.8.9, B3.8.11
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16-6	154	4	3.5.2
16-7	154	2, 4	Tier 2, 16 B3.5.1, B3.8.1, B3.8.4, B3.8.9, B3.8.11
16-8	164	2, 4	Tier 2, 16.3.7.1, 16.3.7.2, 16.3.7.3, B3.7.1, B3.7.2, B3.7.3
		7	2.2 (STD DEP 16.3-16)
16-9	164	2, 4	Tier 2, 16.3.7.1, B3.7.1
		7	2.2 (STD DEP 16.3-16)
16-10	164	2, 4	Tier 2, 16.3.7.2, B3.7.2
		7	2.2 (STD DEP 16.3-16)

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16-13	164	2, 4	Tier 2, 16.5.2.2
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		7	2.2 (STD DEP 16.3-97)
16-15	164	2, 4	Tier 2, 16.5.5.2.6
		7	2.2 (STD DEP 16.5-6)
16-16	164	4	B3.9.5
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16-17	164	4	B2.1
16-18	164	2, 4	Tier 2, 16.3.4 , B3.4, 16B.3.9
		7	2.2 (STD DEPs 16.3-9, 16.3-96 & 16.3-97)
16-19	164	4	3.10.1
		7	2.2 (STD DEP 16.3-97)
16-20	164	2, 4	Tier 2, 16.3.8, B3.8
		7	2.2 (STD DEP 16.3-97)
16-21	167	2, 4	Tier 2, 16.1.1 Definitions, 16.3 (various) & Bases, 16.5.5.2.7, 16.5.5.2.11 & 16.5.7.1
		7	2.2
16-23	167	2, 4	Tier 2, 16B.3.9.7, 16B.3.9.8,
		7	2.2 (STD DEP 16.3-12)
16-24	167	2, 4	Tier 2, 16B.3.1.7,
		7	2.2 (STD DEP 16.3-3)
16-25	181	7	2.2 (STD DEP T1 2.14-1)
16-26	181	4	3.3.1.1, 3.3.1.2, 3.3.1.3
		7	2.2 (STD DEP 16.3-97)
16-27	181	4	Bases for 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.4.1, 3.3.5.1, 3.3.6.1, 3.3.8.2
		7	2.2 (STD DEP 16.3-97)
16-28	186	4	Table 3.3.1.1-1
16-29	186	4	Table 3.3.1.1-1
16-30	186	4	Table 3.3.1.1-1
16-31	186	4	Table 3.3.1.1-1
16-33	186	2	Tier 2, 6.2.5.5
16-34	186	2, 4	Tier 2, 16B.3.3.1.1,
		7	2.2 (STD DEP 16.3-98)
16-35	186	2, 4	Tier 2, 16B.3.3.1.1
		7	2.2 (STD DEP 16.3-97)
16-36	186	4	16B.3.3.1.1

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16-37	186	2, 4	Tier 2, Bases for 3.3.1.1, 3.3.1.4, 3.3.4.1, 3.3.4.2, 3.3.5.1 and 3.3.7.1
		7	2.2 (STD DEP 16.3-99)
16-39	186	2, 4	Tier 2, 16.3.3.4.2 & B3.3.4.2
		7	2.2 (STD DEP 16.3-39)
16-41	186	2, 4	Tier 2, 16B.3.8.3
16-42	187	2, 4	Tier 2, 16.3.10.4
16-43	187	2, 4	Tier 2, 16B.3.1.3
		7	2.2 (STD DEP 16.3-68)
16-44	187	2, 4	Tier 2, 16B.3.10.5
		7	2.2 (STD DEP 16.3-23)
16-45	187	2, 4	Tier 2, 16.3.10.8, B3.10.8
		7	2.2 (STD DEP 16.3-18)
16-46	187	2, 4	Tier 2, 16B.3.8.1
16-47	187	4	Bases for 3.3 (various)
16-48	187	2, 4	Tier 2, 16.3.4.1
16-49	187	4	Bases for 3.3 (various)
16-50	187	4	Bases for 3.8.3
16-51	187	4	Bases for 3.3.1.1
		7	2.2 (STD DEP 16.3-97)
16-52	215	2, 4	Tier 2, 16B.3.8.4
		7	2.2 (STD DEP 16.3-42)
16-53	215	2, 4	Tier 2, 16B.3.10.5
		7	2.2 (STD DEP 16.3-23)
16-54	220	7	2.2 (STD DEP 16.3-78
16-56	220	7	2.2 (STD DEP 16.3-86
16-57	220	2, 4	Tier 2, 16B.3.6.1.1
		7	2.2 (STD DEP 16.3-44)
16-58	220	2, 4	Tier 2, 16.3.6.1.3 & B3.6.1.3
		7	2.2 (STD DEP 16.3-71)
16-59	220	2, 4	Tier 2, 16.3.6.1.3 & Bases
		7	2.2 (STD DEP 16.3-72)
16-60	220	2, 4	Tier 2, 16.3.6.1.3 & Bases
		7	2.2 (STD DEP 16.3-71)
16-61	220	2, 4	Tier 2, 16B.3.1.2
		7	2.2 (STD DEP 16.3-89)
16-62	220	2, 4	Tier 2, 16B.3.1.3
		7	2.2 (STD DEP 16.3-90)
16-63	235	2	Tier 2, 16.3.8.1
		7	2.2 (STD DEP 16.3-103)

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16-64	238	2, 4	Tier 2, 16B.3.8.4,
		7	2.2 (STD DEP 16.3-42)
16-65	238	2, 4	Tier 2, 16.1.1, 16.3.3.1.1 & Bases, 16.3.3.1.4, 16.3.3.4.1 & Bases, 16.3.3.4.2, 16B.3.3.5.1, 16.3.3.7.1 and 16.3.3.8.1, 16B.3.7.7, 16.5.5.2.11
		7	2.2 (STD DEPs 16.3-100, 16.3-101, 16.3-102)
16-66	241	7	2.2 (STD DEP 16.3-73)
16-67	241	2, 4	Tier 2, 16B.3.6.1.3, 16B.3.7.3
		7	2.2 (STD DEPs 16.3-46 and 16.3-74)
16-68	307	2, 4	Tier 2, 16B.3.3.4.2
		7	2.2 (STD DEP 16.3-104)
16-69	307	2, 4	Tier 2, 16.4.1
17.04-1	301	2	Tier 2, 19K
17.04-2	301	2	Tier 2, 19K
17.04-2 (NOTE)	301	2	Tier 2, 19K
17.04-3	301	2	Tier 2, 19K
17.04-4	301	2	Tier 2, 17.4S
17.04-5	301	2	Tier 2, 17.4S
17.04-6	301	2	Tier 2, 17.4S
17.04-6 (NOTE)	301	2	Tier 2, 17.4S
17.04-9 (NOTE)	240	2	Tier 2, 17.4S
17.04-10	240	2	Tier 2, 19K
17.04-11	240	2	Tier 2, 17.4S
17.5-9	319	2	Tier 2, Tables 1.9S-1, 1.9S-2 and QAPD
17.06-1	211	2	Tier 2, 17.6S
17.06-2	211	2	Tier 2, 17.6S
18-1	132	2	Tier 2, 18.8.3
18-2	132	2	Tier 2, 18.8.6
18-3	132	2	Tier 2, 18.8.7
18-4	282	2	Tier 2, 18.4.2.1
		7	2.1 (STD DEP T1 3.4-1)
19-1 (NOTE)	124	2	Tier 2, 9.5, 19.2
		7	3.0 (STP DEP 9.5-2)
19-5 (NOTE)	124	2	Tier 2, 19.9
19-7 (NOTE)	124	2	Tier 2, 19.2
19-14 (NOTE)	124	2	Tier 2, 19.2
19-15	124	2	Tier 2, 19.9
19-16 (NOTE)	124	2	Tier 2, 19.2
19-22 (NOTE)	190	2	Tier 2, 19.9.21
19-23	162	2	Tier 2, 19N
19-26	162	2	Tier 2, 19K, 19R

RAI Question No.	RAI Letter No.	Part	Section(s)
19-27	188	2	Tier 2, 19.9
19-29	293	2	Tier 2, 19.9
19-29 (NOTE)	293	2	Tier 2, 19.9
19-30 (NOTE)	296	2	Tier 2, 2.4S.10, 2.4S.14, 19.4, 19.8, 19.9, 19.11, 19K, 19R
19-31	397	2	Tier 2, 19.9
19-32	397	2	Tier 2, 19.9
19.01-1 (NOTE)	124	2	Tier 2, 19.2, 19.3, 19.9
19.01-15	124	2	Tier 2, 19.2, 19.3
19.01-25 (NOTE)	137	2	Tier 2, 19.4S, 19.9, 19A, 19B
19.01-26	137	2	Tier 2, 19.4S

NOTE: RAI response is supplemented, amended or revised.

Table 2: Environmental RAI Responses

ER RAI Question No.	ER RAI Letter No.	Part 3 ER Section(s)
Part 3, Environmental Report (ER)		
03.03-01	4	3.03, 3.04
05.03.03.01-03	4	5.03, 5.08, 5.01, 5.10
05.04.02-01	3	2.07, 4.05, 5.04, 7.01, 10.05S
05.10-04	4	1.02, 02.03.01, 02.03.02, 02.09S, 3.03, 4.02, 5.01, 5.03, 5.08, 5.10, 10.01, 10.04, 10.05S
09.03.03-04	5	9.03
09.03.03-10 S1	5	9.03
09.03.03-11	5	9.03
Part 2, Safety*		
01-01 (NOTE)	77	01.01, 05.08, 08.01
02.03.05-11	217	02.07
02.04.12-27	202	02.03.01
02.04.12-28 (NOTE)	202	02.03.01
02.04.12-38 (NOTE)	333	02.03.01
03.08.04-18 (NOTE)	299	03.09S
11.02-10 (NOTE)	396	06.02
12.02-17 (NOTE)	316	05.04

*These revisions are also included in Table 1, Safety-Related RAI Responses

NOTE: RAI response is supplemented, amended, or revised.