



Presentation to the ACRS Subcommittee

South Texas Project Units 3 and 4 COL Application Review

**SER/OI Chapter 13
"Conduct of Operations"**

June 23, 2010

1/2



STP COL Chapter 13

Staff Review Team

- **Project Managers**
 - George Wunder, Lead PM
 - Rocky Foster, Chapter PM

- **Technical Staff**
 - Jim Kellum, Lead Reviewer, COLP
 - Robert Moody, Technical Reviewer, NSIR/DPR



Presentation Outline

- Overview of STP Combined License Application Open Items
- 13.1 - Organizational Structural of Applicant
- 13.2 - Training
- 13.5 - Plant Procedures
- 13.4 - Review and Audit
- 13.4S - Operational Program Implementation
- 13.3 - Onsite and Offsite Emergency Plans



Overview of STP Combined License Application

Chapter 13 – Conduct of Operations		
SE Chapter	Subject	Total Open Items
13	Conduct of Operations	1
Total Number of RAIs = 100		



Description of SE Open Items

- Open Item 13.03-1 RAI 13.03-73
TSC Habitability



SER Sections 13.1, 13.2, 13.5

- FSAR Chapter 13, Sections 13.1, 13.2 and 13.5 are out of ABWR Standard Plant Scope of the associated sections of ABWR DCD Chapter 13.

These sections are:

- 13.1 - Organizational Structure of Applicant
- 13.2 - Training
- 13.5 - Plant Procedures



SER Sections 13.1, 13.2, 13.5 - Confirmatory Items

13.05.01.01-1 - Development of Administrative Procedures

- FSAR stated that existing unit administrative procedures would be reviewed and if any changes were required for the new units the procedures would be revised
- Staff determined that the associated RAI responses from the applicant committing to changes in the FSAR were acceptable but these changes have yet to be incorporated in the FSAR.



SER Sections 13.1, 13.2, 13.5 - COL License Information Items

STP COL Item 13.1 - Incorporation of Operating Experience (OE)

- Incorporates by reference NEI 06-13A, rev.1 which has been endorsed by the staff and includes incorporation of OE has been determined to be acceptable.

STP COL Item 13.3 - Plant Operating Procedures Development Plan

- The plan provided in FSAR 13.5.3.1 describes the process and content required by NUREG-0800, Section 13.5.2.1 and TMI items I.C.1 and I.C.9.

STP COL Item 13.4 - Emergency Procedures Development

- The applicant describes the writer's guide, format, training, technical guidelines, etc. for emergency procedure development.



SER Sections 13.1, 13.2, 13.5 - COL License Information Items

STP COL Item 13.5 - Implementation of the plan

- The applicant identified and described the classifications of procedures and commits to follow the criteria of NUREG-0800 for the nature and content of these procedures.

STP COL Item 13.6 - Procedures included in the scope of the plan

- The applicant list of procedures in the STP FSAR is identical to the list provided in NUREG-0800.

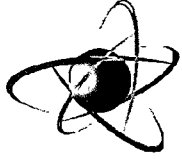
Staff determined these COL information items are acceptably addressed in the STP FSAR.



SER Sections 13.4 & 13.4S – Review and Audit/Operational Programs

- **13.4 - Review and Audit**
 - Incorporated by Reference of ABWR DCD Revision 4
 - COL License Information Item 13.2a - 10 CFR 50.40(b)
 - Complies with Appendix B to NURGE-0933 regarding an independent safety engineering group

- **13.4S – Operational Program Implementation**
 - Operational programs consistent with guidance in SECY-05-0197, RG 1.206 and NUREG-0800



U.S.NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

Section 13.3 - Emergency Planning

- **Section Description:**
 - Onsite and offsite emergency plans
- **Topics of Interest:**
 - One COL Information Item
 - Open Item
 - No departures
- **Unique Features of Application**
 - First applicant to chose to extend elements of the existing emergency plan for the new units.
 - Staff only needed to review the additional information.



COL Information and Open Items

- COL Information Item
 - Applicant Submits Emergency Plans

- Open Item
 - TSC Habitability



Chapter 13.3 of the ABWR DCD

- **Application incorporates by reference:**
 - Description of the locations of the TSC and OSC
 - Decontamination facility



Emergency Planning ITAAC

- Based upon “generic” EP-ITAAC Tables in NUREG-0800 (SRP) and RG 1.206.
- **STP EP-ITAAC:**
 - Table 2.17.1, “Emergency Response Facilities,” of DCD/Tier 1 Material
 - TSC location, size, communications, and displays.
 - OSC location and communications.
 - COLA; Section 4.0, “Emergency Planning ITAAC,” in Part 9, “ITAAC.”
 - Staffing
 - Displays in the EOF and TSC
 - Notification
 - Communications among the ERFs
 - Procedures
 - Exercise objectives
 - Training



Emergency Action Levels

- Based upon existing NRC-endorsed scheme
- License condition to address ABWR digital instrumentation
- Confirmatory Item



Overview of STP COL Chapter 13

Discussion/Committee Questions



Backup Slides



Acceptability of the Existing Site Emergency Plan

- NRC performs oversight of a site's EP program through inspections and by monitoring performance indicators.
 - Drill/exercise performance
 - Response organization participation in drills/exercises
 - Alert and notification system performance
- NRC inspectors perform routine inspections, observe drills and exercises, review licensee corrective actions related to EP, and review emergency plan changes.
- NRC inspectors also evaluate bi-annual exercises involving federal, State and local organizations.



Acceptability of Incorporated Information

- Three criteria
 - Applicable to the proposed reactors
 - Up-to-date when the application is submitted
 - The information is appropriately incorporated into the existing plan



Federal Emergency Management Agency (FEMA)

- Interface with FEMA headquarters and regional office
- Regulations in 44 CFR Part 350
- Guidance in NUREG-0654/FEMA-REP-1, Rev. 1
- Interim Findings Report incorporated by reference
- EP-ITAAC for successful offsite exercise



EALs – Digital I&C

- Digital I & C, particularly for RPS, ESF, and ECCS logic, is not part of the NEI 99-01, Rev. 5 scheme.
- Three Initiating Conditions in NEI 99-01, Rev. 5 are not applicable due to the ABWR digital I & C design.
- Four new Initiating Conditions were developed using the guidance in NEI 07-01 to address STP Units 3 and 4 digital I & C design.
 - Address unplanned, partial and complete loss of indicating, monitoring and control functions at power and when shutdown.