

**From:** Daily, John  
**Sent:** Friday, December 03, 2010 1:53 PM  
**To:** 'Taplett, Kenneth'  
**Cc:** Aldridge, Arden J; Harrison, Albon; Bowman, Tim; Berg, Michael; Powell, Tim  
**Subject:** RE: Acceptance Review issue - Draft RAI for Applicant  
**Attachments:** Draft RAI 4.1-1 for STP Nuclear Operating Company.docx

Ken,  
 Referring to this change as Amendment 1 in response to RAI-4.1-1, is acceptable; in addition, staff indicates that this proposal, as an amendment, would resolve the sufficiency concern as it relates to our acceptance review.  
 We would request that you provide us with a timely date which to expect this amendment and then the amendment itself, both correspondences of which I will place on the docket for STPNOC's LRA.

Can you let me know when to expect your amendment?

I will also convert the draft RAI text into a document of record and provide you with an ADAMS number for your reference; I should be able to accomplish that on Monday.

Please note that, in regards to this issue, the staff may find a need to issue further RAIs and/or engage in conference calls in order to further gain clarifications on it, at some future date.

If any other questions on this approach, please feel free to contact me.

Thanks.

**John Daily, MBA, PMP**  
 Senior Project Manager, Division of License Renewal  
 Office of Nuclear Reactor Regulation  
 USNRC  
[John.Daily@NRC.Gov](mailto:John.Daily@NRC.Gov)  
 (301) 415-3873

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**From:** Taplett, Kenneth [<mailto:kjtaplett@STPEGS.COM>]  
**Sent:** Thursday, December 02, 2010 11:29 AM  
**To:** Daily, John  
**Cc:** Aldridge, Arden J; Harrison, Albon; Bowman, Tim; Berg, Michael; Powell, Tim  
**Subject:** RE: Acceptance Review issue - Draft RAI for Applicant

John,  
 Here is our draft RAI reply. I concur that this proposal can be the subject of a conference call. We can support a call as early as Monday, December 6th.

Some questions regarding our draft response:

1. We don't feel we need a formal RAI from the NRC if you agree that we can reference an email from you.
2. We would refer to our proposed change as Amendment 1 to the LRA. Please advise if that is acceptable to you.
3. I need to add you to our cc:list for LRA correspondence. Please look at our cc:list on page 2 and provide me your mail stop code and correct anything else that I may have incorrect regarding your mailing address.

Ken

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**From:** Daily, John [<mailto:John.Daily@nrc.gov>]  
**Sent:** Thursday, December 02, 2010 9:41 AM

**To:** Taplett, Kenneth  
**Cc:** Aldridge, Arden J  
**Subject:** RE: Acceptance Review issue - Draft RAI for Applicant

Send it on!

I can forward this on to the staff for their thoughts.

Usually in these cases we would also have a conf call for you and staff to talk things thru, so that you get a complete understanding and we get a better understanding from you all as well.

What do you think about making your proposal the subject of the call, then?  
Thanks.

**John Daily, MBA, PMP**

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**From:** Taplett, Kenneth [<mailto:kitaplett@STPEGS.COM>]  
**Sent:** Thursday, December 02, 2010 9:45 AM  
**To:** Daily, John  
**Cc:** Aldridge, Arden J  
**Subject:** RE: Acceptance Review issue - Draft RAI for Applicant

John,

We would like to send you a draft RAI response that we believe would resolve this issue. I tried to leave you a voice mail this morning but your message service did not appear to be set up for me to leave a message. Please let me know if this is an appropriate step to take next that will work for you.

Ken

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**From:** Daily, John [<mailto:John.Daily@nrc.gov>]  
**Sent:** Wednesday, December 01, 2010 7:19 AM  
**To:** Aldridge, Arden J; Taplett, Kenneth  
**Cc:** Pham, Bo; Dozier, Jerry  
**Subject:** Acceptance Review issue - Draft RAI for Applicant

Ken/ Arden,

Please find below our draft RAI 4.1-1, All Exemption Limits Not Identified, for your initial review.

If you desire a conference call to obtain clarification, please let me know by Weds, Dec. 8, 2010 and I will be happy to set it up for the staff and you all. As a part of that call, we will agree upon a response time for you to provide any additional information.

Also note that, since this issue affects the acceptance and sufficiency review, satisfactory completion of this review may be delayed in order to account for any response or LRA changes STPNOC may supply.

Thanks!

**John Daily, MBA, PMP**

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Draft RAI for STP Nuclear Operating Company (STPNOC or the applicant), LRA Section 4.1

#### **RAI 4.1-1, All Exemptions Not Identified**

Background: 10 CFR 54.21(c)(2) requires an applicant to provide a list of all exemptions that have been granted pursuant to 10 CFR 50.12 and that are based on a time-limited aging analysis (TLAA). LRA Section 4.8 provides the applicant's list of exemptions that need to be identified in accordance with 10 CFR 54.21(c)(2). The applicant identified LBB as the only exemption that was granted based on a TLAA.

By letter dated May 4, 1999 (NRC Microfiche Accession 9905110094, Microfiche Address A7956, Pages 355 – 359), the staff issued to the applicant an exemption under 10 CFR 50.12 granting [STPNOC] the right to apply ASME Code Case N-514 as the basis for establishing the low temperature over-pressurization protection (LTOP) system pressure lift and arming temperature set points for the credited power operated relief valves (PORVs). It also granted the use of the Code Case as a basis for setting the LTOP system pressure lift set points for the relief valves to a pressure value that is equivalent to 110% of the limiting pressure established in the approved P-T limits curve for the system's temperature enable set point. The staff noted that the exemption granting the use of the Code Case also permitted the applicant to set the arming temperature for the LTOP system in accordance with the Code Case N-514 arming temperature setpoint methodology.

LRA Section 4.2 identifies that the P-T limits for Units 1 and 2 are TLAAs for the LRA. The staff noted that the LTOP system set points are currently within the scope of Technical Specification limiting condition of operation (LCO) 3.4.9.3 and surveillance requirement (SR) 4.4.9.3 and the P-T limits are currently within the scope of Technical Specification LCO 3.4.9.2 and SR 4.4.9.2.

Issue: The staff noted that granting this exemption and the establishment of the LTOP system pressure set point was a function of the limiting pressure value established in the P-T limit curves for the LTOP systems enable temperature. The staff's position is that, if this exemption remains in effect for the CLB, the exemption may need to be identified as an exemption for the LRA that meets the requirements in 10 CFR 54.21(c)(2) because granting the exemption under 10 CFR 50.12 was based on a value in the approved P-T limits, and the P-T limits for the facilities have been identified as a TLAAs for the LRA.

Request: Clarify whether the exemption on Code Case N-514 remains in effect for the CLB and provide your basis for not identifying this exemption in accordance with 10 CFR 54.21(c)(2).