



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

January 5, 2011
U7-C-STP-NRC-110004

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 Nos. 52-012 and 52-013
Response to Request for Additional Information

Reference: Letter, Scott Head to Document Control Desk, "Response to Requests for Additional Information," dated July 22, 2009, U7-C-STP-NRC-090071 (ML092050077)

Attached is the STP Nuclear Operating Company supplemental response to an RAI question related to Combined License Application (COLA) Part 2, Tier 2, Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria." The original response to this RAI question was submitted in the referenced letter. The attachment provides the response to the RAI question listed below:

14.03-1, Supplement 1

When a change to the COLA is required, it will be incorporated into the next routine revision of the COLA following NRC acceptance of the RAI response.

There are no commitments in this letter.

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

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

Executed on 1/5/11

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

rhb

Attachment: RAI 14.03-1, Supplement 1

DO91
NRO
STI 32806379

cc: w/o attachments and enclosure except*
(paper copy)

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RAI 14.03-1, Supplement 1**QUESTION:**

Acceptance Criteria of Item 11, in Table 2.12.1, "Electric Power Distribution System," Acceptance criteria of item 8 in Table 2.12.2, "Direct Current Power Supply," Acceptance criteria of item 10 in Table 2.12.14, "Vital AC Power Supply," and acceptance criteria of item 9 in Table 2.12.15, "Instrument and Control Power Supply," of Part 9 of the STP COLA address the system interrupting devices coordination and state that " Analysis of as-built----- and concludes that to the maximum extent possible, the analyzed circuit interrupter closest to the fault will open before other devices." Please modify the acceptance criteria to include a justification of acceptability of those instances when coordination cannot be achieved.

RESPONSE:

STPNOC responded to Request for Additional Information (RAI) 14.03-1 in Letter U7-C-STP-NRC-090071, dated July 22, 2009 (ML092050077). In that response, STPNOC modified STD DEP T1 2.12-1, which added the phrase "to the maximum extent possible" to ABWR DCD requirements for breaker and fuse coordination, to require the following:

For instances where coordination cannot be practically achieved, analysis will justify the lack of coordination.

The response to RAI 14.03-1 in Letter U7-C-STP-NRC-090071 modified COLA, Part 9, Chapter 2, to include the requirement that analysis justify instances where full coordination of breakers and fuses is not achieved; however, the changes were not incorporated into COLA, Part 2, Tier 1. Therefore, the response to RAI 14.03-1 is being supplemented to revise COLA, Part 2, Tier 1, to include the requirement that analysis justify instances where breaker and fuse coordination cannot be practically achieved with the changes shown by the gray shaded text provided below:

2.12.1 Electrical Power Distribution System**Design Description**

STD DEP T1 2.12-1

EPD System interrupting devices (circuit breakers and fuses) are coordinated to the maximum extent possible, so that the circuit interrupter closest to the fault opens before other devices. For instances where coordination cannot be practically achieved, analysis will justify the lack of coordination.

2.12.12 Direct Current Power Supply

Design Description

STD DEP T1 2.12-1

Class 1E DC electrical distribution system interrupting devices (circuit breakers and fuses) are coordinated to the maximum extent possible, so that the circuit interrupter closest to the fault opens before other devices. For instances where coordination cannot be practically achieved, analysis will justify the lack of coordination.

2.12.14 Vital AC Power Supply

Design Description

STD DEP T1 2.12-1

Class 1E Vital AC Power Supply system interrupting devices (circuit breakers and fuses) are coordinated to the maximum extent possible, so that the circuit interrupter closest to the fault opens before other devices. For instances where coordination cannot be practically achieved, analysis will justify the lack of coordination.

2.12.15 Instrument and Control Power Supply

Design Description

STD DEP T1 2.12-1

Class 1E Instrument and Control Power Supply system interrupting devices (circuit breakers and fuses) are coordinated to the maximum extent possible, so that the circuit interrupter closest to the fault opens before other devices. For instances where coordination cannot be practically achieved, analysis will justify the lack of coordination.

Table 2.12.1 Electric Power Distribution System

Item 11; Acceptance Criteria:

11. Analyses for the as-built EPD System exist and conclude that, **to the maximum extent possible**, the analyzed circuit interrupter closest to the fault will open before other devices. For instances where coordination cannot be practically achieved, the analysis will justify the lack of coordination.

Table 2.12.12 Direct Current Power Supply

Item 8, Acceptance Criteria:

8. Analyses for the as-built Class 1E DC electrical distribution system circuit interrupting devices exist and conclude that, **to the maximum extent possible**, the analyzed circuit interrupter closest to the fault will open before other devices. For instances where coordination cannot be practically achieved, the analysis will justify the lack of coordination.

Table 2.12.14 Vital AC Power Supply

Item 10, Acceptance Criteria:

10. Analyses for the as-built Class 1E Vital AC Power Supply system circuit interrupting devices (circuit breakers and fuses) coordination exist and conclude that, **to the maximum extent possible**, the analyzed circuit interrupter closest to the fault will open before other devices. For instances where coordination cannot be practically achieved, analysis will justify the lack of coordination.

Table 2.12.15 Instrument and Control Power Supply

Item 9, Acceptance Criteria:

9. Analyses for the as-built Class 1E Instrument and Control Power Supply system circuit interrupting devices (circuit breakers and fuses) coordination exist and conclude that, **to the maximum extent possible**, the analyzed circuit interrupter closest to the fault will open before other devices. For instances where coordination cannot be practically achieved, the analysis will justify the lack of coordination.

The changes to COLA, Part 2, Tier 1, shown above will be incorporated during the next routine revision to the COLA.