From: Thadani, Mohan
Sent: Monday, January 24, 2011 1:21 PM
To: Harrison, Albon; Walker, Philip
Cc: Lent, Susan
Subject: RAI FOR REQUEST TO REVISE TECHNICAL SPECIFICATION 6.8.3 COTAINMENT TENDONS (TAC NOS. ME3969 AND ME3970)

Wayne/Phillip:

The NRC staff has reviewed the license amendment request (LAR) submitted by South Texas Project (STP) Electric Generating Station, Inc., by letter dated May 18, 2010. The applicable ASME Code Edition for STP, Units 1 and 2 will change when the current 10-year inspection interval ends in September 2010. Therefore, the licensee has requested to revise Technical Specification 6.8.3.I, "Containment Post-Tensioning System Surveillance Program", by removing the specific reference to the 1992 Edition with 1992 Addenda of the ASME Code Section XI, Subsection IWL. This LAR would allow STP, Units 1 and 2 to perform future updates of the surveillance program without requiring additional Technical Specification changes.

The NRC staff has identified areas where additional information is needed to complete the review of the LAR. The NRC staff's request for additional information is outlined below:
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_____

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST (LAR) TO REVISE TECHNICAL SPECIFICATION (TS) 6.8.3.I RELATED TO THE CONTAINMENT TENDON SURVEILLANCE PROGRAM
SOUTH TEXAS PROJECT, UNITS 1 AND 2
(TAC NOS. ME3969 AND ME3970)

The NRC staff has reviewed the South Texas, Units 1 and 2 proposed amendment to Technical Specification (TS) 6.8.3.I for the Containment Post-Tensioning System Surveillance Program. As discussed during the teleconferences that were held on November 23, 2010 and January 19, 2011, the staff has determined that additional information is needed in order to continue the review process of this license amendment request . The request for additional information relates to the specific section of the regulation referenced in the proposed new wording, as submitted in Section 2 of the LAR, by letter dated May 18, 2010.

In the LAR, the licensee specifically references 10 CFR 50.55a(b)(2)(viii) in the new, proposed TS wording. However, 10 CFR 50.55a(b)(2)(viii) only provides the regulatory conditions that apply when using Subsection IWL of specific code editions and addenda, included by reference in the rule. It does not provide information that would determine the Code edition and addenda to be used in any given 120-month inservice inspection (ISI) interval. Therefore, as the staff addressed during the teleconferences, the proposed TS language does not cite the appropriate paragraph in the regulations that would determine the Code edition and addenda to be used in the subsequent 120-month ISI intervals. The staff notes that the determination of the appropriate code edition and addenda and the applicable regulatory conditions would be made based on the provisions in paragraph 10 CFR 50.55a(g)(4), but not those in

10 CFR 50.55a(b)(2)(viii).

It should be noted that in the current (existing) TS wording, the ASME Code Section XI, Subsection IWL, 1992 Edition with 1992 Addenda is explicitly referenced and, therefore, the reference to 10 CFR 50.55a(b)(2)(viii) for the applicable regulatory conditions associated with use of this code edition and addenda was appropriate. It is also noted that the Standard Technical Specification language generically cites the 10 CFR 50.55a rule, as a whole, and not 10 CFR 50.55a(b)(2)(viii) for the Pre-Stressed Concrete Containment Tendon Surveillance Program.

Please clarify this discrepancy and provide the appropriate reference to the regulations in the proposed wording of TS 6.8.3.l in the LAR.

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