



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

March 4, 2011
NOC-AE-11002650
File No.: G25
10 CFR 170
STI: 32832265

Chief Financial Officer (CFO)
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Request for Fee Waiver as Risk Informed Pilot Plant

References:

1. Letter dated 9 December, 2010 from Ed Halpin to Chairman Jaczko, "Letter to NRC Commissioners Regarding GSI-191 Status." (ML103481027, NOC-AE-10002625)
2. Staff Requirements Memorandum (SRM) dated 23 December, 2010, "Closure options for Generic Safety Issue-191, Assessment of Debris Accumulation on Pressurized Water Reactor Sump Performance." (ML103610102).

In the referenced letter STP Nuclear Operating Company (STPNOC) proposed to submit a risk informed approach consisting of comprehensive and robust probabilistic models of phenomena related to the sequence of events from a postulated pipe break to the recirculation phase of sump strainer performance.

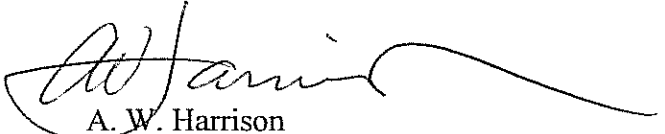
STPNOC's proposed application will apply risk insights to calculate the changes in risk, including Core Damage Frequency (CDF) and Large Early Release Frequency (LERF), from the actual plant configuration with debris generating insulation installed and with it removed. STPNOC provided additional detail regarding the proposed risk informed approach during public meetings on 27 January, 2011 and 22 February, 2011. This detail included the project team makeup, the phenomena to be modeled, the codes to be used for the modeling, and how the results and associated uncertainties would be integrated.

STPNOC proposes this application as a risk informed pilot for GSI-191 closure. The purpose of this pilot is to support closure of an ongoing generic regulatory effort, GL 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors." As stated in the SRM, "the staff should take the time needed to consider all options to a risk-informed, safety conscious resolution to GSI-191." This proposed risk informed approach is a suitable and appropriate process for a GSI-191 closure pilot. STPNOC believes that this pilot effort will result in substantial benefit to both the NRC and industry and is supportive of ongoing regulatory improvement efforts.

Alternatively, if an additional GSI-191 closure pilot is not feasible, the proposed approach also utilizes computational physics models to develop risk insights in a manner not previously performed. The results of this pilot have great potential to move PRA techniques forward and benefit the NRC as well as current and future nuclear power plants. This risk informed approach is also a suitable and appropriate process as a pilot for Regulatory Guide (RG) 1.174, An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis.

STPNOC requests that the review fees be waived for this application under the provisions of 10 CFR 170.11. STPNOC understands that the fee waiver would extend to the entire review of the proposed exemption and license amendment request.

If there are any questions on this submittal, please contact either J. L. Paul at (361) 972-7344 or me at (361) 972-7298.



A. W. Harrison
Licensing Manager

JLP

cc:
(paper copy)

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
612 East Lamar Blvd, Suite 400
Arlington, Texas 76011-4125

Mohan Thadani
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (MS 8 G14)
11555 Rockville Pike
Rockville, MD 20852

Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

John Ragan
Catherine Callaway
Jim von Suskil
NRG South Texas LP

Ed Alarcon
Kevin Pollo
Richard Pena
City Public Service

Peter Nemeth
Crain Caton & James, P.C.

C. Mele
City of Austin

Richard A. Ratliff
Texas Department of State Health Services

Alice Rogers
Texas Department of State Health Services