PMSTPCOL PEmails

From: Eudy, Michael
Sent: Thursday, January 20, 2011 3:14 PM
To: Chappell, Coley; Elton, Loree; Scheide Richard
Cc: STPCOL; Wunder, George; Joseph, Stacy
Subject: STP New Draft RAI for Chapter 1
Attachments: RAI 5419.doc

Importance: High

Coley et. al.

Please review the attached draft RAI for Chapter 1 and let NRC staff know if you need to arrange a teleconference to discuss or if we can issue the RAI as is.

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U.S. Nuclear Regulatory Commission
NRO/DNRL/NGE1&2
301-415-3104

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From: Eudy, Michael

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Request for Additional Information No. 5419 Revision 4

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 01 - Introduction and Interfaces
Application Section: 1.5

QUESTIONS for Fire Protection Team (SFPT)

01-***

In your response to RAI 1-18, Item 1 (dated 8/4/2010), you stated that Revision 4 to the STP Units 3&4 COL application would incorporate by reference the ABWR DCD amendment application for aircraft impact. You have now revised your application to incorporate by reference the ABWR STP Aircraft Impact Assessment (AIA) Amendment, Revision 3, dated September 23, 2010. The NRC's proposed rulemaking certifying the amendment was published in the *Federal Register* on January 20, 2011 (76 FR 3540). The proposed revisions to Appendix A of 10 CFR Part 52 include the addition of provisions in Section VIII for controlling changes to AIA information included in the STP Nuclear Operating Company (STPNOC) DCD for the amendment. The new provisions in proposed paragraph VIII.B.5.d would require that applications referencing the STPNOC DCD and proposing to depart from AIA information shall consider the effect of the changes on the original assessment required by 10 CFR 50.150(a). In addition, applicants would also document how the modified design continues to meet the assessment requirements in 10 CFR 50.150(a)(1), in accordance with Section X of Appendix A.

Paragraph X.A.3 requires an applicant referencing Appendix A to prepare and maintain written evaluations which provide the bases for the determinations required by Section VIII. These evaluations must be retained throughout the period of application and for the term of the license. Furthermore, Paragraph IV.A.2 requires that applications referencing Appendix A include reports on departures from, and updates to, the plant-specific DCD required by Paragraph X.B of Appendix A. Paragraph X.B requires applicants referencing Appendix A to submit a report to the NRC "containing a brief description of any plant-specific departures from the DCD, including a summary of the evaluation of each."

In your response to RAI 1-18 Item 2, you stated that you identified a number of STP 3&4 application departures that related to key design features credited in the AIA assessment. Please provide a list of these departures, briefly describe them, and explain how you have met the provisions of paragraphs VIII.B.5.d and X.A.3 of the proposed rule certifying the ABWR STP AIA Amendment. Describe how you came to the conclusion that "none of these departures affects the overall conclusions in Appendix 19S relative to aircraft impact; that is, the key design features credited in the application are still valid for the aircraft assessment," as was stated in your response to RAI 1-18, Item 2. Finally, please document these conclusions in your Departures Report.