



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 24, 2011

Mr. G. T. Powell  
Vice President, Technical Support and Oversight  
STP Nuclear Operating Company  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION – FUTURE CONSIDERATION OF OPERATING EXPERIENCE  
(TAC NOS. ME4936 AND ME4937)

Dear Mr. Powell:

By letter dated October 25, 2010, South Texas Project Nuclear Operating Company (STP) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54), to renew Operating Licenses NPF-76 and NPF-80 for STP, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, per the enclosure, an area where additional information is needed to complete the review.

This request for additional information was discussed with Mr. Arden Aldridge, and a mutually agreeable date for the response is by June 27, 2011. If you have any questions, please contact me at (301) 415-3873 or by e-mail at [john.daily@nrc.gov](mailto:john.daily@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "John Daily". The signature is fluid and cursive, with a large initial "J" and "D".

John Daily, Sr. Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
As stated

cc w/encl: Listserv

SOUTH TEXAS LICENSE RENEWAL APPLICATION  
SECTION B1.4, "OPERATING EXPERIENCE"

**RAI B1.4-1**

Background:

Pursuant to 10 CFR 54.21(a)(3), a license renewal applicant is required to demonstrate that the effects of aging on structures and components subject to an aging management review are adequately managed so that their intended functions will be maintained consistent with the current licensing basis for the period of extended operation. Section 3.0.1 of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," Revision 2 (SRP-LR), defines an aging management review as the identification of the materials, environments, aging effects, and aging management programs (AMPs) credited for managing the aging effects. In turn, SRP-LR Section A.1.2.3 defines an acceptable AMP as consisting of ten elements. Element 10, "Operating Experience," in part, is described in SRP-LR Section A.1.2.3.10, paragraph 1, as follows:

Consideration of future plant-specific and industry operating experience relating to aging management programs should be discussed. Reviews of operating experience by the applicant in the future may identify areas where aging management programs should be enhanced or new programs developed. An applicant should commit to a *future review of plant-specific and industry operating experience to confirm the effectiveness of its aging management programs or indicate a need to develop new aging management programs* (emphasis added). This information should provide objective evidence to support the conclusion that the effects of aging will be managed adequately so that the structure and component intended function(s) will be maintained during the period of extended operation.

In addition, 10 CFR 54.21(d) requires the application to contain a final safety analysis report (FSAR) supplement. This supplement must contain a summary description of the programs and activities for managing the effects of aging and the evaluation of time-limited aging analyses for the period of extended operation.

Based on its review of the South Texas Project, Units 1 and 2, license renewal application (LRA), the staff determined that Section B1.4 provides a general description of how the applicant gathered and considered operating experience in preparing its LRA, and Sections B2.1.1 through B2.1.37 and B3.1 through B3.3 summarize the specific operating experience considered for each AMP.

Issue:

Although LRA Sections B1.4, B2.1.1 through B2.1.37, and B3.1 through B3.3 describe how the applicant incorporated operating experience into its AMPs, they do not fully describe how the applicant will use future operating experience to ensure that the AMPs will remain effective for managing the aging effects during the period of extended operation. The main focus of these LRA sections is on how the applicant evaluated operating experience available at the time the

ENCLOSURE

application was prepared to justify the adequacy of its proposed AMPs. Some of the program descriptions, particularly those for new programs, contain statements indicating that future plant-specific and industry operating experience will be used to adjust the programs as appropriate. However, for the majority of the AMPs, it is not clear whether the applicant currently has or intends to implement actions to monitor operating experience on an ongoing basis and use it to ensure the continued effectiveness of the AMPs. The LRA also does not state whether new AMPs will be developed, as necessary. Further, the majority of the AMP descriptions do not provide the staff reasonable assurance that ongoing operating experience reviews will continue to inform AMP updates for license renewal.

Request:

Describe the programmatic activities that will be used to continually identify aging issues, evaluate them, and, as necessary, enhance the AMPs or develop new AMPs for license renewal. In this description, address the following:

- Describe the sources of plant-specific and industry operating experience that are monitored on an ongoing basis to identify potential aging issues. Indicate whether these plant-specific sources require monitoring: corrective action program, system health reports, licensee event reports (LERs), and the results of inspections performed under the AMPs. Similarly, indicate whether these industry sources require monitoring: vendor recommendations, revisions to industry standards on which the AMPs are based, LERs from other plants, NRC Bulletins, Generic Letters, Regulatory Issue Summaries, Information Notices, Regulatory Guides, License Renewal Interim Staff Guidance, and revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." Describe the criteria used to classify a particular piece of information as aging related and outline the training provided to plant personnel so that they can adequately make such classifications.
- Describe how the identified aging issues are further evaluated to determine their potential impact on the plant aging management activities. Indicate whether the affected structures and components and their materials, environments, aging effects, aging mechanisms, and AMPs are identified and documented consistent with the methods used to prepare the LRA. Describe how the results of AMP inspections are considered to adjust the frequency of future inspections, establish new inspections, and ensure an adequate depth and breadth of component, material, environment, and aging effect combinations. Describe the records of these evaluations and indicate whether they are maintained in an auditable and retrievable form.
- Describe the process and criteria used to ensure that the identified enhancements are implemented in a timely manner.
- Describe the administrative controls over these programmatic activities.

Provide a summary description of these activities for the FSAR supplement required by 10 CFR 54.21(d). If enhancements for license renewal are necessary, also provide the updates for the FSAR supplement.

If such an operating experience program is determined to be unnecessary, provide a detailed explanation of the bases for this determination.

May 24, 2011

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Sincerely,  
*/RA/*  
John Daily, Senior Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
As stated

cc w/encl: Listserv

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\*concurrence via e-mail

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| DATE   | 05/23/11 | 05/24/11    | 05/24/11    | 05/24/11     |

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Letter to G.T.Powell from J. Daily dated May 24, 2011

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