



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

June 6, 2011

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

SUBJECT: PLAN FOR THE AGING MANAGEMENT PROGRAM REGULATORY AUDIT
REGARDING THE SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE
RENEWAL APPLICATION REVIEW (TAC NOS. ME4936 AND ME4937)

Dear Mr. Powell:

By letter dated October 25, 2010, STP Nuclear Operating Company submitted an application for renewal of operating licenses NPF-76 and NPF-80 for South Texas Project (STP), Units 1 and 2. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants."

The staff plans to conduct its aging management program regulatory audit at STP, Units 1 and 2, during the weeks of June 13 and June 20, 2011, in accordance with the enclosed regulatory audit plan. If you have any questions, please contact me by telephone at (301) 415-3873 or by e-mail at john.daily@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "John W. Daily".

John W. Daily, Sr. Project Manager
Reactor 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



Audit Plan

Aging Management Program Audit for the South Texas Project, Units 1 and 2 License Renewal Application

June 13 – 24, 2011

**Division of License Renewal
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission**

ENCLOSURE

License Renewal Aging Management Program Audit Plan South Texas Project

1. Background

By letter dated October 25, 2010, STP Nuclear Operating Company (STPNOC or the applicant) submitted to the U.S. Nuclear Regulatory Commission (NRC or the staff) its application for renewal of Operating License Nos. NPF-76 and NPF-80 for South Texas Project (STP), Units 1 and 2, respectively. The applicant requested renewal of the operating licenses for an additional 20 years beyond the 40-year current license terms, which expire on August 20, 2027, for Unit 1 and December 15, 2028, for Unit 2. The staff from the Division of License Renewal will lead a regulatory audit to gain a better understanding of the applicant's Aging Management Programs, aging management reviews, and associated bases and documentation as applicable.

2. Regulatory Audit Bases

License renewal requirements are specified in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Guidance is provided in NUREG-1800, Rev. 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), dated December 2010, and in NUREG-1801, Rev. 2, "Generic Aging Lessons Learned (GALL) Report," dated December 2010.

3. Regulatory Audit Scope or Methodology

The scope of this audit is to: (a) examine the applicant's Aging Management Programs (AMPs) for STP Units 1 and 2; and (b) verify the applicant's claims of consistency with the corresponding GALL Report AMPs. Enhancements to AMPs will be evaluated on a case-by-case basis. Exceptions to the GALL Report AMP elements will be evaluated separately as part of the NRC staff's review of the license renewal application (LRA), and will be documented in the staff's safety evaluation report (SER).

The SRP-LR allows an applicant's LRA to reference its AMPs as being consistent with the AMPs described in the GALL Report. By referencing the GALL Report AMPs in this manner, the applicant is concluding that its AMPs correspond to those AMPs and that no further staff review should be required. If an applicant credits an AMP for being consistent with a GALL Report program, it is incumbent on the applicant to ensure that the plant program contains all of the elements of the referenced GALL Report program. The applicant's determination shall be documented and maintained in an auditable, retrievable form.

During this audit, the staff will audit program elements 1 - 6 (scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, and acceptance criteria), and program element 10 (operating experience), of the applicant's AMPs claimed to be consistent with the GALL Report against the equivalent elements of the associated AMP described in the GALL Report, unless otherwise indicated. Program elements 7 - 9 (corrective actions, confirmation process, and administrative controls) are audited by another NRC project team during the scoping and screening methodology audit, and

are evaluated separately. In addition, the staff will verify that the conditions at the plant are bounded by the conditions for which the GALL Report program was evaluated.

The staff will also examine the applicant's program bases documents and related references for these AMPs, perform selected in-plant walkdowns, and interview applicant representatives to obtain additional clarification related to the AMPs.

4. Information and Other Material Necessary for the Regulatory Audit

The project team will review the LRA, the AMPs, the AMP basis documents, and other applicant supporting documentation as appropriate.

The project team would like for at least one hard-copy set of AMPs, AMP basis documents, and all other relevant documentation to be available in the team's work room.

Work space and team support logistics:

- One general team work area with seating and laptop space for 15 people.
- Three break-out rooms for question/answer/small group sessions and meetings, so that work in the main room will not be disrupted.
- Telephone access for in-plant and/or outside business-related calls. The break-out rooms should also have speaker phone capability for conference calls.
- Access to printers for printing out drafts, draft requests for additional information (RAIs), review comments, schedules, and so on.
- Access to a copier for making duplicates for team use, meeting agendas and so on
- Information on availability of food/snacks that the team would be able to purchase, or nearby restaurants.

5. Team Assignments

NRC Staff participation is projected as follows (some deletions, additions or substitutions may occur on an as-needed basis):

Week of June 13, 2011, Electrical/Structural:

Area of Review	Assigned Auditor
Project Manager	John Daily
Branch Chief	Rajender Auluck

Week of June 20, 2011, Mechanical/Materials:

Area of Review	Assigned Auditor
Project Manager	John Daily

Area of Review	Assigned Auditor
Branch Chief	Dave Pelton/Antonio Dias

6. Logistics

The audit will be conducted on-site at STP, Units 1 and 2, during the weeks of June 13 and June 20, 2011. An entrance and an exit briefing will be held at the beginning and end of this audit, respectively.

Each week's activities will begin on Monday morning and are normally planned to extend through part of the day Friday. Normally a status briefing should be held at the close of a day's activities to highlight progress and any special issues identified, and to review and/or adjust the schedule for the next day's work.

7. Special Requests

The staff requests the applicant to make available their LRA program basis documentation and their condition report database for independent searches by the regulatory audit team.

8. Deliverables

An audit summary report will be issued to the applicant, normally within 90 days from the end of the audit.

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/RA/

John W. Daily, Sr. Project Manager
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*concurrence via email

OFFICE	LA: DLR*	PM: DLR/RPB1	BC: DLR/RPB1	PM: DLR/RPB1
NAME	IKing	JDaily	BPham	JDaily
DATE	05/26/2011	06/2/2011	06/2/2011	06/6/2011

OFFICIAL RECORD COPY

Letter to G.T. Powell from John W. Daily dated June 6, 2011

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