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June 8, 2011
U7-C-NINA-NRC-110078

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Supplemental Response to Request for Additional Information

Attached is a supplemental response to the NRC staff question included in Request for Additional Information (RAI) letter 359 related to Combined License Application (COLA) Part 2, Tier 2, Sections 6C and 4.4. Attachment 1 addresses the response to the RAI question listed below:

RAI 04.04-4 Supplement 2

This response provides a commitment in COLA Appendix 6C to ensure that the license condition downstream fuel test reflects industry experience with such tests. The commitment is listed in Attachment 2.

If you have any questions regarding this response, please contact me at (361) 972-7136, or Bill Mookhoek at (361) 972-7274.

D091
NRD

STI 32878699

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/8/11

Scott Head
Manager, Regulatory Affairs
South Texas Project Units 3 & 4

jet

Attachments:

1. RAI 04.04-4 Supplement 2
2. Commitment

cc: w/o attachment except*
(paper copy)

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RAI 04.04-4 Supplement 2

QUESTION:

During the NRC staff audit (held on July 12, 2010) of the calculations supporting the downstream fuel effects test acceptance criterion of 5.076 psid (U7-C-STP-NRC-100044 dated February 22, 2010), the staff discovered that the calculations were based on Optima II fuel rather than the GE-7 fuel approved in the ABWR DCD. Explain how the proposed criterion is suitable for the fuel design that is currently the basis for the ABWR design.

SUPPLEMENTAL RESPONSE:

The initial response to this RAI was provided by STPNOC Letter No.U7-C-STP-NRC-110006 dated January 6, 2011. The response provided a complete markup of Appendix 6C, superseding previous markups of the Appendix. This supplemental response provides a markup to Subsection 6C.3 to add a commitment to reflect industry experience with downstream testing in the final downstream test procedure that is provided to the NRC for their review six (6) months prior to performance of the test.

The gray shading indicates changes from the RAI response in Letter No. U7-C-STP-NRC-110006.

6C.3.1.9 Downstream Fuel Effects Test

Prior to the initial fuel load, a downstream effects test for the fuel is performed to ensure that small debris passing through the suction strainers does not impair the flow to the core. The detailed test procedure will be provided to the NRC at least six months prior to performing the test and will reflect industry experience with performance of such tests, for example consideration of fuel assembly geometry, debris addition and test protocol, number of tests, and provisions for assessing test variability (COM 6C-2). The following discusses the test plan, the analysis basis, and the debris assumptions used for this test.

Commitment

Commitment Number	Commitment Summary	Milestone Date
COM 6C-2	The detailed test procedure for the downstream fuel test will be provided to the NRC at least six months prior to performing the test and will reflect industry experience with performance of such tests, for example consideration of fuel assembly geometry, debris addition and test protocol, number of tests, and provisions for assessing test variability	Six (6) months prior to performance of the downstream fuel test.