



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

June 8, 2011
NOC-AE-11002675
10 CFR 50.54(f)

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 No. STN 50-498, STN 50-499
30-Day Response to NRC Bulletin 2011-01, Mitigating Strategies

Pursuant to 10 CFR 50.54(f), this letter provides the STP Nuclear Operating Company (STPNOC) 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011. The bulletin was issued to confirm continued compliance with 10 CFR 50.54(hh)(2) and request information regarding the mitigation strategies programs.

The NRC identified the following three objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

NRC Bulletin 2011-01 requested that within 30 days, licensees submit a response to questions to confirm continued compliance with 10 CFR 50.54(hh)(2) and requested within 60 days that licensees provide information regarding mitigation strategies programs required by 10 CFR 50.54(hh)(2). STPNOC's 30-day response is provided in the attachment.

There are no commitments in this letter.

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If you have questions regarding this letter please contact either Robyn Savage (Licensing contact) at 361-972-7438 or me at 361-972-7454.

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

Executed on June 8, 2011

A handwritten signature in black ink that reads "Charles T. Bowman". The signature is written in a cursive style with a large initial "C" and a long horizontal flourish at the end.

Charles T. Bowman
General Manager
Nuclear Safety Assurance

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Attachment: 30-Day Response to Bulletin 2011-01

cc:
(paper copy)

(electronic copy)

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

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

Balwant K. Singal
U. S. Nuclear Regulatory Commission

Balwant K. Singal
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (MS 8B1)
11555 Rockville Pike
Rockville, MD 20852

John Ragan
Catherine Callaway
Jim von Suskil
NRG South Texas LP

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

Ed Alarcon
Kevin Pollo
Richard Pena
City Public Service

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

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

30-Day Response to Bulletin 2011-01

The NRC has requested the following information:

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), within 30 days of the date of this bulletin, the NRC requests that licensees provide the following information on their mitigating strategies programs.

NRC Request 1

Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

STPNOC Response (1)

STPNOC inspected and inventoried equipment necessary to implement the mitigating strategies required by 10 CFR 50.54 (hh)(2) and verified it was available. In addition, the portable pump required for some of the strategies as well as the station's three (3) permanently installed fire pumps were tested to ensure they were capable of performing their intended function with respect to the mitigation strategies. Letters of Agreement/Memorandums of Understanding with offsite organizations were also re-validated and/or re-issued, as appropriate.

NRC Request 2

Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

STPNOC Response (2)

10 CFR 50.54 (hh)(2) requires licensees to implement guidance and strategies under the circumstances associated with loss of large areas of the plant due to explosions or fire, in the following areas:

- (i) Fire fighting;*
- (ii) Operations to mitigate fuel damage; and*
- (iii) Actions to minimize radiological release.*

STPNOC verified that the mitigation strategies associated with large area fires and explosions are available and capable of being performed as described in our Mitigation Strategy License Condition. Each procedure implementing the required mitigation strategies was walked down to ensure the procedure(s) are in place and capable of being implemented. The mitigation strategies have been maintained. STPNOC's mitigation strategies continue to meet the commitments described in our B.5.b submittals as documented in the B.5.b Safety Evaluation Report - SER (See Reference 1), except those changes made to the strategies since the issuance of STPNOC's Safety Evaluation Report. These changes have been evaluated and documented in accordance with NEI 99-04, "Guidelines for Managing NRC Commitment

30-Day Response to Bulletin 2011-01

Changes (Rev. 0) and continue to meet the requirements of NEI 06-12, B.5.b Phase 2 & 3 Submittal Guideline (Rev. 2).

STPNOC is capable of executing the strategies with the current staffing. As discussed above, each procedure implementing the required mitigation strategies was walked down to ensure the procedures were in place and capable of being implemented. In developing the strategies STPNOC considered staffing and skill levels in order to perform the strategies. Operations and support staff have had training and periodic retraining, as required, on the mitigation strategies procedures.

In the event of certain threats, plant personnel are directed to disperse in accordance with procedures to maximize the survivability in order to implement the strategies should they be needed. Procedures identify the command and control responsibilities including succession, as appropriate. Procedures are in place to call back fire brigade /security/emergency response organization members (through an automated dialing system) to assure adequate staffing in the event of a large fire or explosion.

Reference 1: South Texas Project Units 1 and 2 - Conforming License Amendments to Incorporate The Mitigation Strategies Required by Section B.5.b. of Commission Order EA-02-026 TAC Nos. MD4639 AND MD4640, dated July 11, 2007 (AE-NOC-07001653)