

## PMSTPCOL PEmails

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**From:** Joseph, Stacy  
**Sent:** Wednesday, July 27, 2011 3:03 PM  
**To:** 'Cashell, George S'; 'ccchappell@stpegs.com'  
**Cc:** 'Elton, Loree'; STPCOL  
**Subject:** DRAFT RAI for Chapter 16  
**Attachments:** RAI 5946.doc

Steve,

Please see attached DRAFT RAI for Chapter 16 related to STD DEP T1 2.5-1 (removal of new fuel racks). Please let me know if you need to have a telecon to discuss.

Thank you,

Stacy Joseph  
Project Manager  
U. S. Nuclear Regulatory Commission  
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**From:** Joseph, Stacy

**Created By:** Stacy.Joseph@nrc.gov

**Recipients:**

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Request for Additional Information No. 5946 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 16.4 Design Features; Tier 1 DCD Section 2.5

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

In its letter (U7-C-NINA-NRC-110098) of July 19, 2011, NINA proposed to remove the new fuel storage racks from the New Fuel Vault of the STP 3&4 ABWR design and revise Standard Departure STD DEP 9.1-1. The attachments to this letter contained a new site specific Tier 1 Departure (STP DEP T1 2.5-1) to remove the new fuel racks from the New Fuel Vault, a revision to departure STD 9.1-1, and the COL application changes associated with these revisions. One of the changes associated with STD DEP T1 2.5-1 omits generic TS 4.3.1.2 (related to center to center distance between fuel assemblies) for new fuel storage from plant-specific TS Subsection 4.3.1, Criticality.

NUREG-1433, Standard Technical Specifications, General Electric Plants, BWR/4, Revision 3 (STS) 4.3.1.1.c specifies that the **spent fuel** storage racks are designed and shall be maintained with a "nominal [6.5] inch center to center distance between fuel assemblies placed in the storage racks."

STS 4.3.1.2.d specifies that the **new fuel** storage racks are designed and shall be maintained with a "nominal [6.50] inch center to center distance between fuel assemblies placed in storage racks." Like the STS, generic TS 4.3.1.2.d also specifies a center to center distance between fuel assemblies placed in the storage racks. However, as noted, STD DEP T1 2.5-1 omits generic TS 4.3.1.2 for new fuel storage from plant-specific TS Subsection 4.3.1.

However, unlike STS 4.3.1.1.c, generic TS Section 4.3.1.1 is missing the provision that specifies a center to center distance between fuel assemblies placed in the spent fuel storage racks. The staff identifies the following reasons why the provision of STS 4.3.1.1.c should be added to plant-specific TS 4.3.1.1.

- The generic TS 4.3.1.2 new fuel storage requirement for nominal center to center distance between assemblies placed in the new fuel storage racks should continue to apply when the new fuel is placed in the spent fuel storage racks.
- Including this provision as plant-specific TS 4.3.1.1.c would achieve consistency with STS 4.3.1.1.c.
- The NRC staff previously rejected an industry proposal to remove this provision from STS Rev. 0, Subsection 4.3.1.1 (NUREG-1433, [Rev 0](#), [change traveler WOG-24](#), change C.9, was rejected by the staff on July 27, 1993.)
- The staff has not found an official agency record on the ABWR DC docket that contains an explicit justification for omitting this provision from the ABWR generic TS.

Therefore, the staff requests that the applicant revise departure STD DEP T1 2.5-1 to add the provision of STS 4.3.1.1.c to the plant-specific TS.