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

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
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Rockville, MD 20852-2746

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Request for Additional Information for the Review of the
South Texas Project License Renewal Application (TAC Nos. ME4936 and ME4937)

Reference:
1. STPNOC Letter from G. T. Powell to NRC Document Control Desk, "License Renewal Application," dated October 25, 2010 (NOC-AE-10002607) (ML103010257)
2. NRC letter, "Request for Additional Information for South Texas Project, Units 1 and 2 License Renewal Application – Scoping and Screening Balance of Plant,' dated July 12, 2011 (ML11166A239)

By Reference 1, STP Nuclear Operating Company (STPNOC) submitted the License Renewal Application (LRA) for South Texas Project (STP) Units 1 and 2. By Reference 2, the NRC staff requested additional information for the review of the STP LRA. STPNOC's response to the request for additional information is included in Enclosure 1 to this letter.

There are no regulatory commitments in this letter.

Should you have any questions regarding this letter, please contact either Arden Aldridge, STP License Renewal Project Lead, at (361) 972-8243 or Ken Taplett, STP License Renewal Project regulatory point-of-contact, at (361) 972-8416.

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

Executed on August 9, 2011
Date

G. T. Powell
Vice President,
Technical Support & Oversight

KJT

Enclosure: STPNOC Response to Request for Additional Information

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STPNOC Response to Request for Additional Information

Plant Level Scoping Results

RAI 2.2-1

Background:

The license renewal scoping criteria were described in License Renewal Application (LRA) Section 2.1. LRA Section 2.2, Table 2.2-1, "Scoping Results," provides the results of applying the license renewal scoping criteria to the systems, structures, and components.

Issue:

The following system, as described in the Updated Final Safety Analysis Report (UFSAR), could not be located in LRA Table 2.2-1.

UFSAR Section	System
7.5.7 Emergency Response Facilities Data Acquisition and Display System (ERFDADS)	Emergency Response Facilities Data Acquisition and Display System

Request:

The staff requests that the applicant provide the basis for excluding the "Emergency Response Facilities Data Acquisition and Display System" from Table 2.2-1.

STPNOC Response

The Emergency Response Facilities Data Acquisition and Display System is within the scope of license renewal and is a subsystem of the Post Accident Monitoring System. The Post Accident Monitoring System is shown on Table 2.2-1 as being within the scope of license renewal.

Auxiliary Systems Requests for Additional Information

RAI 2.3-01

Background:

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to aging management review (AMR) by reviewing the results of the screening of components within the license renewal boundary.

Issue:

Continuation Issue: For the drawing locations identified in the table below, the continuation of piping in scope for license renewal could not be found.

LRA Section/Drawing Number & Location	Continuation Piping/Drawing Number
2.3.4.4 Demineralizer Water (Make-up) System	
LR-STP-DW-5S1999F05034#1 AND #2 coordinates E-6	2"DW1503WD9 / 2"DW2503WD9 continuing to drawing 9B00143 coordinates D-4. The continuation drawing (9B00143) could not be found in the information provided.
LRA Section/Drawing Number & Location	**Continuation Piping/Drawing Number**
2.3.3.27 Miscellaneous Systems in scope ONLY for Criterion 10 CFR 54.4 (a)(2)	
LR-STP-NL-6S190F0009 coordinates H-2	2"NL0038WN7 line continuation from drawing 0F00015 (not provided).
LR-STP-OC-6T249F00033#1 and #2 coordinates G-3	4"WL1165WG7/4"WL2165WG7 continuations from drawing 9F90001 (Liquid Radwaste System).
LR-STP-PW-9M889B0148#1 and #2, under "Demineralized Water P&ID"	2" line from drawing 9F5034.
LR-STP-PW-9Q130F00013 coordinates F-4 and F-7	1"PW1086WU9, 1"PW1087WU9, 1"PW1088WU9, 1"PW2086WU9, 1"PW2087WU9, 1"PW2088WU9 continuing to drawing 9B0171.
LR-STP-MD-6T169F00055#1 and #2 coordinates A-8	1"MD1235HC9/1"MD2235HC9 lines from drawing 9F00024 (Main Steam Drain from Aux FPT).

Request:

The staff requests that the applicant provide sufficient information for the continuation issues identified above to permit the staff to review all portions of the systems within the license renewal boundary.

STPNOC Response

Item #1 - LR-STP-DW-5S1999F05034#1/#2, E-6 continuation:

Boundary drawings LR-STP-DW-5S1999F05034#1 & #2 (E-6) for piping 2"DW1503WD9 & 2"DW2503WD9 continue to isometric drawing 6M-06-9-B-0143 for showers, heaters, and sink details. Isometric drawing 6M-06-9-B-0143 was not used as a boundary drawing. Plumbing drawing 9M-88-9-B-0148 was used as the boundary drawing for in-scope showers, heaters, and sinks. The continuation from boundary drawings LR-STP-DW-5S1999F05034#1 & #2 (E-6) downstream of valves PD0091 goes to boundary drawing LR-STP-PW-9M889B0148#1 & #2. See approximate coordinate E-2 for valves PD-091.

Item #2 - LR-STP-NL-6S190F00009, H-2 continuation issue:

Various sections of buried piping were removed from the scope of license renewal following a re-evaluation of buried piping in February, 2011. As a result of that review, boundary drawing LR-STP-NL-6S190F00009 is no longer needed since the highlighted piping on the drawing is no longer in-scope. Piping 2"NL0038WN7 and the continuation to drawing 0F00015 are no longer in-scope.

Item #3 - LR-STP-OC-6T249F00033#1 & #2, G-3 continuation:

Piping 4"WL1165WG7 & 4"WL2165WG7 continues from boundary drawings LR-STP-OC-6T249F00033#1 & 2 (G-3) to boundary drawings LR-STP-WL-7R309F90001#1 & #2 (D-1) as 10 CFR 54.4(a)(2) spatial interaction. Boundary drawing LR-STP-WL-7R309F90001#2 correctly depicts the 4"WL2165WG7 piping and valves highlighted red with an spatial interaction (SI) termination symbol shown. However, boundary drawing LR-STP-WL-7R309F90001#1 inadvertently omits the red highlighting but the SI termination symbol is shown. The piping and valves are in-scope and should be highlighted red.

Boundary drawing LR-STP-WL-7R309F90001#1 (D-1) will be updated to highlight the 4"WL1165WG7 piping and valves red. The drawing will be consistent with boundary drawing LR-STP-WL-7R309F90001#2 (D-1).

Item #4 - LR-STP-PW-9M889B0148#1 & #2 continuation:

See response to Item #1. This is the same piping and continuation.

Item #5 - LR-STP-PW-9Q130F00013, F-4 & F-7 continuation:

The continuation drawing from boundary drawing LR-STP-PW-9Q130F00013 (F-4 & F-7) is a plumbing detail drawing (9D-06-9-B-0171) that is considered to be below the level of detail for a boundary drawing. The piping to the shower/eye wash stations is in-scope as 10 CFR 54.4 (a)(2) spatial interaction in the diesel generator buildings but is not detailed on a boundary drawing.

Item #6 - LR-STP-MD-6T169F00055#1 & #2, A-8 continuation:

Boundary drawings LR-STP-MD-6T169F00055#1 & #2 (A-8) continuation for piping 1"MD1235HC9 & 1"MD2235HC9 lead to boundary drawing LR-STP-AF-5S141F00024-1 (H-8) which leads to LR-STP-MS-5S141F00024-2 (D-8). Piping 1"MD1235HC9 & 1"MD2235HC9 is in-scope as 10 CFR 54.4(a)(2) spatial interaction and structural integrity attached and is correctly shown on boundary drawings LR-STP-MD-6T169F00055#1 & #2 and LR-STP-MS-5S141F00024-2.

Section 2.3.3.3 Cranes and Hoists

RAI 2.3.3.3-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

UFSAR Section 3.8.4.1.1, Mechanical-Electrical Auxiliaries Building (MEAB), states that the 7.5-ton overhead bridge crane necessary for handling radioactive solid waste is not within the scope of license renewal. This crane is located in the MEAB which is in scope for Title 10 of the *Code of Federal Regulations* (10 CFR) 54.4(a)(1), 10 CFR 54.4(a)(2) and 10 CFR 54.4(a)(3).

The staff requests the applicant provide the basis for not including the MEAB 7.5-ton overhead bridge crane within the scope of license renewal.

STPNOC Response

Cranes and hoists are included within the scope of license renewal if they carry heavy loads over safety-related components or over irradiated fuel in the reactor vessel or spent fuel pool. The solid waste processing 7-1/2 ton gantry cranes (7R321XCM101A and 7R322XCM201A) are in an area of the MEAB that does not contain safety-related components or irradiated fuel in the load path of these cranes. Further, as shown in the Master Equipment Database, these cranes are Quality Class 9, which indicates that they are not Seismic II/I components. Therefore, the solid waste processing 7-1/2 ton gantry cranes are not within the scope of license renewal.

Section 2.3.3.4 Essential Cooling Water and ECW Screen Wash

RAI 2.3.3.4-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-EW-5R289F05038 #1-1 & #1-2 and LR-STP-EW-5R289F05038 #2-1, #2-2, & #2-3, coordinates C-4, depict a section of 6"EW1122WF7 piping to the essential cooling water discharge structure as not within the scope of license renewal. However, LR-STP-EW-5R289F05038 #1-3, coordinates C-4, depicts this section of 6"EW1122WF7 piping to the essential cooling water discharge structure as within the scope of license renewal for 10 CFR 54.4(a)(2).

The staff requests the applicant provide the basis for the differences in the scoping of the piping downstream of the termination symbol within the scope of license renewal.

STPNOC Response

Boundary drawing LR-STP-EW-5R289F05038#1-3 inadvertently shows the portion of piping highlighted downstream of the F.4.e termination symbol. The red highlighting should stop at the F.4.e termination symbol. The other five boundary drawings are correctly highlighted. Boundary drawing LR-STP-EW-5R289F05038#1-3 (location C-4 will be updated to remove the red highlighting. Therefore, the section of 6"EW1122WF7 piping to the essential cooling water discharge structure discussed above is not within the scope of license renewal.

RAI 2.3.3.4-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-EW-5R289F05038 #2-1 coordinates E-4, depicts a section of 10 CFR 54.4 (a)(1) 4"EW2126WD8 piping continued to LR-STP-DR-F20005 #2 coordinates F-6, where it is shown within scope of license renewal for 10 CFR 54.4(a){2).

The staff requests the applicant provide the basis for the scoping classification change from 10 CFR 54.4(a)(1) to 10 CFR 54.4(a)(2).

STPNOC Response

The piping shown on boundary drawing LR-STP-EW-5R289F05038#2-1 at location E-4 indicates a safety-related to non-safety-related interface at valve FV6935. Drawing LR-STP-EW-5R289F05038#2-1, location E-4 inadvertently shows the non-safety-related portion as green, but it should have been highlighted red. This agrees with the piping interface to drawing LR-STP-DR-6Q069F20005#2 (this is the same drawing as LR-STP-DR-F20005 #2 referred to in the RAI above), location F-6 which shows the interfacing piping highlighted red for 10 CFR 54.4(a)(2). However, drawing LR-STP-DR-6Q069F20005#2, location F-6 shows an SI termination symbol which should be an F.4.1 triangle symbol to terminate structural integrity attached from drawing LR-STP-EW-5R289F05038#2-1, location E-4.

Drawing LR-STP-EW-5R289F05038#2-1 (location E-4) will be updated to change the green highlighting of the non safety-related piping to red 10 CFR 54.4(a)(2) highlighting as discussed above. Also, drawing LR-STP-DR-6Q069F20005#2 (location F-6) will be updated to change the SI termination symbol to an F.4.1 triangle symbol for termination of structural integrity attached from drawing LR-STP-EW-5R289F05038#2-1 (location E-4).

RAI 2.3.3.4-03

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-EW-5R289F05038 #1-3 coordinates C-4, depicts a piping section 6"EW1322WF7 into the Essential Cooling Water Discharge Structure. The license renewal boundary for comparable piping sections 6"EW1122WF7 and 6"EW1222WF7 on LRA drawings LR-STP-EW-5R289F05038 #1-1 and LR-STP-EW-5R289F05038 #1-2 coordinates C-4, respectively, stops at the 10 CFR 54.4(a)(2) termination symbols.

The staff requests the applicant provide the basis for the difference in license renewal boundaries.

STPNOC Response

Boundary drawing LR-STP-EW-5R289F05038#1-3 inadvertently shows the portion of piping highlighted downstream of the F.4.e termination symbol. The red highlighting should stop at the F.4.e termination symbol. The other two boundary drawings discussed above are correctly highlighted.

Boundary drawing LR-STP-EW-5R289F05038#1-3, location C-4 will be updated to remove the red highlighting downstream of the F.4.e termination symbol.

Section 2.3.3.5 Reactor Makeup Water

RAI 2.3.3.5-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

The applicant indicated, on LRA drawings LR-STP-RM-5R279F05033 #1 and #2 coordinates G-4, a floating seal of the reactor makeup water storage tanks 1A & 1B as not within the scope of license renewal. LRA Table 2.3.3-5 does not list this floating seal. This component appears to be part of the reactor makeup water system, which is depicted as being within the scope of license renewal for 10 CFR 54.4(a)(1).

The staff requests that the applicant provide the basis for excluding the floating seal from within the scope of license renewal.

STPNOC Response

The reactor makeup water storage tank (RMWST) is safety-related and in scope for 10 CFR 54.4(a)(1). The floating seals for the RMWSTs shown on drawings LR-STP-RM-5R279F05033#1 & #2 (location G-4) were inadvertently not highlighted. These seals are not safety-related and do not perform any safety function but are within the scope of license renewal for non-safety affecting safety per 10 CFR 54.4(a)(2). The non-safety function of the seals is to control oxygen levels in the makeup water. The dissolved oxygen levels of the water are monitored to indicate degradation of the seals. When the levels exceed the threshold, the seals are replaced. The seals are short-lived components and therefore do not require aging management review. Operating experience has demonstrated that using dissolved oxygen as a replacement indicator will provide reasonable assurance that the seals are replaced prior to any effect on the RMWST safety function.

Boundary drawings LR-STP-RM-5R279F05033#1 & #2 will be revised to highlight the seals red for 10 CFR 54.4(a)(2) scoping.

RAI 2.3.3.5-02

In LRA Section 2.1.2.2, the applicant indicated that nonsafety-related SSCs attached to safety-related SSCs are within the scope of license renewal for 10 CFR 54.4(a)(2) up to the first seismic anchor past the safety/nonsafety interface.

On LRA drawings LR-STP-RM-5R279F05033 #1 & #2 at coordinates G-7, the staff could not locate seismic anchors on the 10 CFR 54.4(a)(2) non-safety related lines connected to safety-related lines downstream of valves FV7664.

The staff requests that the applicant provide the location of the seismic anchors.

STPNOC Response

Dashed piping (designates interfacing piping from another plant system) is shown to the left of valve FV 7663 on drawings LR-STP-RM-5R279F05033#1 & #2, location G-7. Dashed piping is not highlighted on boundary drawings. The continuation flag calls out drawing "9Z00047" grid location F-1, which corresponds to boundary drawing LR-STP-PS-9Z329Z00047. The continuation shows a connection to the primary sample panel (ZLP131), which is credited as an equivalent anchor, indicated by the "F.4.3" triangle at grid location H-3.

Section 2.3.3.6 Component Cooling Water

RAI 2.3.3.6-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-CC-5R209F05017 #1 and #2 coordinates G-6, depict short pipe extensions off of valve CC0746 that are within the scope of license renewal for 10 CFR 54.4a)(2). The short pipe extensions have no identification, anchor, or boundary location established.

The staff requests the applicant provide the identification, anchor, or boundary location for these pipe section extensions.

STPNOC Response

Drawings LR-STP-CC-5R209F05017#1 & #2 show the correct configuration of the piping and valves. Isometric drawing 3M379PCC7561 confirms the configuration as a 6" pipe stub attached to valve CC0746. The pipe stub is non-safety-related and is included within the scope of license renewal for spatial interaction and structural integrity attached. As a general rule, terminal component symbols (triangles and/or hexagons) are not depicted at obvious pipe terminations on boundary drawings since that would add clutter to drawings.

RAI 2.3.3.6-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-CC-5R209F05020 #1 and #2 coordinates E-1, depict pipe sections 1" CC1647XC7 and 1" CC2647XC7 within the scope of license renewal under 10 CFR 54.4(a)(2)

continued to LRA drawings LR-STP-SB-5S209F20002 #1 and #2 coordinates D-4, where they are shown as not within the scope of license renewal.

The staff requests the applicant provide a basis for not including the pipe sections on LRA drawings LR-STP-SB-5S209F20002 #1 and #2 within the scope of license renewal.

STPNOC Response

Piping sections 1"CC1647XC7 and 1"CC2647XC7 on boundary drawings LR-STP-CC-5R209F05020#1 & #2 (location E-1) are in-scope for spatial interaction and are highlighted red. However, the drawings do not have the "SI" terminal component hexagon symbol depicted before the continuation to boundary drawings LR-STP-SB-5S209F20002#1 & #2. The termination of spatial interaction before the continuation is based on the piping leaving an area with safety-related components. The piping sections continued on drawings LR-STP-SB-5S209F20002#1 & #2 are not in-scope.

Boundary drawings LR-STP-CC-5R209F05020#1 & #2 will be revised to add spatial interaction termination symbols on lines 1"CC1647XC7 and 1"CC2647XC7 before the continuation to the next drawing.

RAI 2.3.3.6-03

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-CC-5R209F05020 #1 and #2 coordinates B-1, depict 10 CFR 54.4(a)(2) pipe sections 1 "CC1649XC7 and 1 "CC2649XC7 continued from LRA drawings LR-STP-SB-5S2099F20002 #1 and #2 coordinates D-4, where they are shown as not within the scope of license renewal.

The staff requests the applicant provide the basis for not including the pipe sections within the scope of license renewal on LRA drawings LR-STP-SB-5S2099F20002 #1 and #2.

STPNOC Response

Piping sections 1"CC1649XC7 and 1"CC2649XC7 on boundary drawings LR-STP-CC-5R209F05020#1 & #2 (location B-1) are in-scope for spatial interaction and are highlighted red. However, the drawings do not have the "SI" terminal component hexagon symbol depicted before the continuation to boundary drawings LR-STP-SB-5S209F20002#1 & #2. Termination of spatial interaction before the continuation is based on the piping leaving an area with safety-related components. The piping sections continued on drawings LR-STP-SB-5S209F20002#1 & #2 are not in-scope.

Boundary drawings LR-STP-CC-5R209F05020#1 & #2 will be revised to add spatial interaction termination symbols on lines 1"CC1649XC7 and 1"CC2649XC7 before the continuation to the next drawing.

Section 2.3.3.7 Compressed Air

RAI 2.3.3.7-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-IA-8Q119F00048 #1-1 coordinates G/H-6, 7, and 8, depicts an instrument air compressor (8Q111MCO0014), including the check valves and continuation lines, as within the scope of license renewal for 10 CFR 54.4(a)(3). However, for the standby unit instrument air compressors (8Q111MCO0011, 8Q111MCO0012 and 8Q111MCO0013), the license renewal boundary is shown to end at ball valves IA9813 (coordinates F-6), IA9814 (coordinates G-5) and IA9821 (coordinates F-6). Ball valves IA9813 and IA9821 are normally open valves and do not prevent any backflow into the standby unit instrument air compressors. A similar condition exists on the Unit 2 drawing LR-STP-IA-8Q119F00048 #2-1.

The staff requests the applicant provide the basis for the license renewal boundary at the open ball valves.

STPNOC Response

The main compressed air flow path from instrument air compressors 8Q111MCO0014 & 8Q112MCO0024 is in-scope to support a 10 CFR 54.4(a)(3) fire protection intended function as shown on boundary drawings LR-STP-IA-8Q119F00048#1-1 & LR-STP-IA-8Q119F00048#2-1. The scoping boundary ends at ball valves IA9813 (location F-6), IA9821 (location F-6) and IA9814 (location G-5) because each valve represents the first closable valve off the main instrument air flow path from instrument air compressors 8Q111MCO0014 & 8Q112MCO0024. These valves are not required to be normally closed, but are only required to have the capability to be closed in order to support the 10 CFR 54.4(a)(3) fire protection intended function.

RAI 2.3.3.7-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-IA-8Q119F00048 #1-1 and LR-STP-IA-8Q119F00048 #2-1 coordinates E-5, depict wet air tanks (8Q111MTS0161, and 8Q112MTS0161) within the scope of license renewal for 10 CFR 54.4(a)(3). However, the relief valves (PSV 8571) on these tanks are shown as not within the scope of license renewal. Similar air tanks (8Q111MTS0163 and 8Q112MTS0163 at coordinates E/F-2) on these LRA drawings show the relief valves as within the scope of license renewal.

The staff requests the applicant provide the basis for not including the relief valves on wet air tanks 8Q111MTS0161, and 8Q112MTS0161 within the scope of license renewal.

STPNOC Response

Relief valve PSV8571 on boundary drawings LR-STP-IA-8Q119F00048#1-1 and LR-STP-IA-8Q119F00048#2-1 (location E-5) were inadvertently not included in-scope of license renewal and are not highlighted on the boundary drawings. These valves should be in-scope for 10 CFR 54.4(a)(3).

Relief valve PSV8571 will be included in-scope and boundary drawings LR-STP-IA-8Q119F00048#1-1 and LR-STP-IA-8Q119F00048#2-1 (location E-5) will be updated to highlight these valves "green" for 10 CFR 54.4(a)(3).

RAI 2.3.3.7-03

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-IA-8Q119F00048 #1-1 and LR-STP-IA-8Q119F00048 #2-1 coordinates G-2, depict 1" drain lines (IA1237UD8 and IA2237UD8) attached to the instrument air receiver tanks (8Q111MTS0162, and 8Q112MTS0162) as within the scope of license renewal for 10 CFR 54.4(a)(3). However, for similar 1" drain lines (IA1238UDS and IA2238UD8) on instrument air receiver tanks (8Q111MTS0163, and 8Q112MTS0163) at coordinates E-2, the license renewal boundary is shown to end at valves IA9980 and the line continuing after the valve is shown as not within scope of license renewal.

The staff requests the applicant provide a basis for the different scoping classifications for the lines downstream of the drain valves.

STPNOC Response

The 1" drain line piping attached to the instrument air receiver tanks (8Q111MTS0162, and 8Q112MTS0162) and downstream of valves IA9979 is inadvertently highlighted "green". The piping is not within the scope of license renewal. The 10 CFR 54.4(a)(3) boundary is at valve IA9979 since it is a closable valve. The piping downstream of valve IA9980 is depicted correctly and is not within the scope of license renewal since it is downstream of a closable valve (IA9980). Ending the 10 CFR 54.4(a)(3) scoping boundary at valves IA9979 & IA9980 is appropriate because the valves can be closed to support the 10 CFR 54.4(a)(3) fire protection intended function of maintaining main flow path integrity.

Boundary drawing LR-STP-IA-119F00048#1 (location G-2) will be updated to remove the green highlighting discussed above.

RAI 2.3.3.7-04

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-IA-8Q119F00048 #2-2 coordinates B-6, depict a line with a capped end, upstream of a 4"x3" reducer, as within the scope of license renewal for 10 CFR 54.4(a)(3). However, a similar line on drawing LR-STP-IA-8Q119F00048 #1-2 coordinates B-6, is shown as not within the scope of license renewal.

The staff requests the applicant provide a basis for not including the line on LRA drawing LR-STP-IA-8Q119F00048 #1-2 coordinates B-6 within the scope of license renewal.

STPNOC Response

The Unit 2 boundary drawing (LR-STP-IA-8Q119F00048#2-2) correctly shows the small piece of piping with a capped end in the scope of license renewal. Boundary drawing LR-STP-IA-8Q119F00048#1-2 at location B-6 inadvertently shows this piece of pipe as out-of-scope, and should have been highlighted green.

Boundary drawing LR-STP-IA-8Q119F00048#1-2 at location B-6 will be updated to highlight the capped end piping green for 10 CFR 54.4(a)(3) as discussed above.

RAI 2.3.3.7-05

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

For the LRA drawing locations identified in the table below, the piping on the main drawing is shown as within the scope of license renewal but is shown as not within the scope of license renewal on the continuation drawing.

LRA Section/Drawing Number & Location	Continuation Piping/Drawing Number
LR-STP-IA-8Q119F05050#1 and #2 coordinates G/F-2	Lines 1"IA1826WK8/1"IA2826WK8 to LR-STP-WL-7R309F05026#1 and #2 coordinates G-4, (incorrectly shown as 9F05050 G-2)
LR-STP-IA-8Q119F05050#1 and #2 coordinates F-2	Lines 1"IA1829WK8/1"IA2829WK8 to LR-STP-BR-7R189F05011#1 and #2 coordinates F-6

The staff requests the applicant provide the basis for not including the continuation piping within the scope of license renewal.

STPNOC Response

Item 1 - The green highlighting on boundary drawings LR-STP-IA-8Q119F05050#1 & #2, location G-2 should stop after the first closable valve to indicate termination of 10 CFR 54.4(a)(3) scoping. LR-STP-IA-8Q119F05050#1 & #2 inadvertently continues the green highlighting to the continuation flag. The continuation piping downstream of valve IA0827 is depicted correctly and is not within the scope of license renewal since it is downstream of a closable valve (IA0827). Boundary drawings LR-STP-IA-8Q119F05050#1 & #2, location G-2 will be updated to remove the green highlighting downstream of IA0827 and show the piping as not in-scope.

Item 2 - The green highlighting on boundary drawings LR-STP-IA-8Q119F05050#1 & #2, location F-2 should stop after the first closable valve to indicate termination of 10 CFR 54.4(a)(3) scoping. LR-STP-IA-8Q119F05050#1 & #2 inadvertently continues the green highlighting to the continuation flag. The continuation piping downstream of valve IA0832 is depicted correctly and is not within the scope of license renewal since it is downstream of a closable valve (IA0832).

Boundary drawings LR-STP-IA-8Q119F05050#1 & #2, location F-2 will be updated to remove the green highlighting downstream of IA0832 and show the piping as not in-scope.

Section 2.3.3.8 Primary Process Sampling

RAI 2.3.3.8-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-5Z329Z00045 #1 and #2 coordinates H-4, depict piping within the scope of license renewal under 10 CFR 54.4(a)(2) continuing to valve XPS0327 on the same LRA drawings coordinates at C-6, where it is shown as not within the scope of license renewal.

The staff requests the applicant provide the basis for the difference in scoping classification.

STPNOC Response

The pipe continuation from boundary drawings LR-STP-PS-5Z329Z00045#1 & #2 (location H-4) to location C-6 should be highlighted red with an SI symbol at valves XPS0327. The pipe continuation is in-scope for spatial interaction until it connects to valves XPS0327 which is located on the primary sample panel.

Boundary drawings LR-STP-PS-5Z329Z00045#1 & #2 (location C-6) will be updated to highlight the piping to valve XPS0327 red and an SI symbol will be added at valve XPS0327 to terminate the spatial interaction.

RAI 2.3.3.8-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-5Z329Z00045 #1 and #2 coordinates D-4, depict piping continuing to valves XPS0330 within the scope of license renewal under 10 CFR 54.4(a)(2). On the same LRA drawings at coordinates C-6, the piping is not shown within the scope of license renewal.

The staff requests the applicant provide the basis for the differing scoping classifications.

STPNOC Response

The continuation of piping on boundary drawings LR-STP-PS-5Z329Z0045#1 & #2 (location D-4) downstream of valve XPS0330 to location B-2 is within the primary sample panel and is not in-scope for spatial interaction. Red highlighting inadvertently applied to the piping at location B-2 and the SI symbol should be removed.

Boundary drawings LR-STP-PS-5Z329Z0045#1 & #2 (location B-2) will be updated to remove the red highlighting on the piping from valve XPS0330 and to remove the SI symbol downstream of valve XPS0209.

RAI 2.3.3.8-03

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-5Z329Z00045 #1 and #2 coordinates D-1, depict piping within the scope of license renewal for 10 CFR 54.4(a)(2) with a continuation from valve CV0273 coordinates E-8 on LRA drawings LR-STP-CV-SR179F05008 #1 and #2, where it is shown as not within the scope of license renewal from valve CV0273.

The staff requests the applicant provide the basis for the difference in scope classification.

STPNOC Response

The piping associated with valve CV0273 on boundary drawings LR-STP-CV-5R179F05008 (this is the same drawing as LR-STP-CV-SR179F05008 referred to in the RAI) #1 and #2, location D-8 is not within the scope of license renewal and is not highlighted on the drawings. The piping continuation from boundary drawings LR-STP-CV-5R179F05008#1 and #2 to boundary drawings LR-STP-PS-5Z329Z0045#1 and #2, location D-1 is incorrectly highlighted red. This piping is not within the scope of license renewal and should not be highlighted red.

Boundary drawings LR-STP-PS-5Z329Z0045#1 and #2 (location D-1) will be updated to remove the red highlighting discussed above.

RAI 2.3.3.8-04

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-5Z329Z00045 #1 and #2 coordinates B-1, depict piping within the scope of license renewal under 10 CFR 54.4(a)(2). The pipe continuations on drawings LR-STP-ED-7Q069F90012 #1 and #2 coordinates H-8, are depicted as not within the scope of license renewal.

The staff requests the applicant provide the basis for the continuation piping not being within the scope of license renewal.

STPNOC Response

The continuation from boundary drawings LR-STP-PS-5Z329Z00045#1 & #2 (location B-1) goes to boundary drawings LR-STP-ED-7Q069F90012#1 & #2 (locations H-8). However, boundary drawings LR-STP-ED-7Q069F90012#1 & #2 (locations H-8) do not depict an off-sheet connector coming from boundary drawings LR-STP-PS-5Z329Z00045#1 & #2 (location B-1). The continuation is shown on drawings LR-STP-ED-7Q069F90012#1 & #2 (location H-8) as coming from "Sample Room Reactor Grade Sampler." The continued piping is correctly highlighted "red" for spatial interaction on drawings LR-STP-ED-7Q069F90012#1 & #2 (location H-8). No changes are required.

RAI 2.3.3.8-05

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-PS-5Z329Z00045 #1 coordinates F-7, depict a 10 CFR 54.4(a)(2) pipeline 1"PS1020BD7 within the scope of licensing renewal for 10 CFR 54.4(a)(2) that ends at the intersection with the inside primary sample panel. No spatial interaction symbol is shown.

The staff requests the applicant provide the basis for the license renewal boundary at the intersection of the pipe and the panel.

STPNOC Response

The spatial interaction termination symbol on boundary drawing LR-STP-PS-5Z329Z00045#1 (location F-7) is inadvertently omitted. The symbol is correctly shown on the corresponding Unit 2 drawing LR-STP-PS-5Z329Z00045#2 (location F-7).

Boundary drawing LR-STP-PS-5Z329Z00045#1(location F-7) will be updated to add the "SI" termination symbol.

RAI 2.3.3.8-06

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-5Z329Z00045 #1 and #2 coordinates G-4, depict a digital pressure indicator (dpi) located in a 10 CFR 54.4(a)(2) pipeline. The dpi is shown as not within the scope of license renewal, and has been disconnected electrically and spared in place according to the notes. The dpi appears to provide a pressure boundary function for a portion of the 10 CFR 54.4 (a)(2) pipelines.

The staff requests the applicant provide the basis for the dpi casing not being in scope for 10 CFR 54.4(a)(2).

STPNOC Response

Digital pressure indicator PI0659 is a leakage boundary component and should be included in-scope and highlighted red on boundary drawings LR-STP-PS-5Z329Z00045#1 & #2. PI0659 is spared in-place and disconnected electrically but the piping has not been cut and capped and is therefore in-scope for 10 CFR54.4(a)(2) spatial interaction.

A leakage boundary component for PI0659 will be included in-scope for 10 CFR 54.4(a)(2) spatial interaction. Boundary drawings LR-STP-PS-5Z329Z00045#1 & #2 (location G-4) will be updated to highlight PI0659 red for spatial interaction. LRA Table 2.3.3-8 and 3.3.2-8 will be updated to add the housing of the pressure indicator.

RAI 2.3.3.8-07

In LRA Section 2.1.2.2 the applicant indicates that nonsafety-related SSCs attached to safety-related SSCs are within the scope of license renewal for 10 CFR 54.4(a)(2) up to the first seismic anchor past the safety/nonsafety interface.

LRA drawings LR-STP-PS-5Z549Z47501 #1 and #2 coordinates C-4, depict a waste collection unit that is within the scope of license renewal for 10 CFR 54.4(a)(2) which contains nonsafety-related attached to safety-related components.

The staff requests the applicant provide the basis for why the waste collection unit and contained components within the scope of license renewal for 10 CFR 54.4(a)(2) do not depict equivalent anchoring like F.4.3 shown on the sample condition rack and the liquid and gas sample panel on the same drawing.

STPNOC Response

The waste collection unit and contained components in scope for 10 CFR 54.4(a)(2) do not show equivalent anchoring because a seismic anchor is credited prior to the piping attaching to the waste collection unit. A seismic anchor is indicated at grid location C-3 to the left of valve AP0006, serving the safety-related/non-safety-related (SR/NSR) interface at grid location C-3 (at FV2458). Therefore, the waste collection unit is not being credited for anchoring any safety-related piping. The other piping connections to the waste collection unit are in-scope for spatial interaction only.

RAI 2.3.3.8-08

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-9Z329Z00047 #1 and #2 coordinates F-5, depict a pipeline within the scope of license renewal for 10 CFR 54.4(a)(2) with a continuation to coordinates B-2 on LRA drawings LR-STP-CV-PS-5Z329Z00045 #1 and #2, where it is shown as not within the scope of license renewal to the drain header.

The staff requests the applicant provide the basis for the change in scoping classification of this pipe section.

STPNOC Response

Boundary drawings LR-STP-PS-9Z329Z00047#1 & #2 (location F-5) inadvertently depict a red highlighted pipe and an SI symbol. The red highlighting and SI symbol are incorrect and should be removed. The piping is within the panel and is not in-scope for 10 CFR 54.4(a)(2) spatial interaction.

Boundary drawings LR-STP-PS-9Z329Z00047#1 & #2 (location F-5) will be updated to remove the red highlighted pipe and SI symbol.

RAI 2.3.3.8-09

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-PS-9Z329Z00047 #1 and #2 coordinates C-2, depict a 10 CFR 54.4(a)(2) piping intersecting XPS0120 which is not depicted as being in the scope of licensing renewal.

The staff requests the applicant provide the basis for the scope change at the intersection of the two pipes.

STPNOC Response

LR-STP-PS-9Z329Z00047 #1 & #2 inadvertently omit an SI termination symbol at grid location C-2. The spatial interaction scoping ends upstream of the continuation where it intersects the piping leading to valve XPS0120.

Boundary drawings LR-STP-PS-9Z329Z00047 #1 & #2 (location C-2) will be updated to add the "SI" termination symbol at the intersection of the demineralized water line and the line to valve XPS0120.

Section 2.3.3.9 Chilled Water HVAC

RAI 2.3.3.9-01

In LRA Section 2.1 the applicant states that its screening process was used to identify the passive, long-lived structures and components within the scope of license renewal and subject to AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

LRA drawings LR-STP-CH-3V119V10003 #1 and #2 coordinates B-2, depict the Radwaste Control Room AHUs as abandoned in place. The AHU coils are shown on LR-STP-HM-5V109V00008 #1 and #2 coordinates B-5, as within the scope of license renewal for 10 CFR 54.4(a)(2). Connected piping to the AHU coils is shown within the scope of license renewal for 10 CFR 54.4(a)(1). There is no change in safety class indicated at the coil/piping interface. The staff questions if the coils provide a safety-related function, e.g. pressure boundary, and should be within the scope of license renewal for 10 CFR 54.4(a)(1).

The staff requests the applicant provide the basis for the scoping classification of the AHU coils.

STPNOC Response

The piping to the abandoned-in-place chillers (i.e the AHUs referred to in the RAI above) depicted in 3V101VAH018 and 3V102VAH018 (location B-2) is safety-related as shown on boundary drawings LR-STP-CH-3V119V10003#1 and #2. Prior to being abandoned-in-place, the chillers were also safety-related. However, since the chillers are taken out of service and abandoned-in-place they no longer have an 10 CFR 54.4(a)(1) intended function.

Since the chillers could not be verified to have been drained and cut and capped to isolate the chillers from water sources, the chillers have been included within the scope of license renewal as 10 CFR 54.4(a)(2) for spatial interaction considerations (red piping on boundary drawings LR-STP-HM-5V109V00008#1 and #2, location B-5). The chillers are also in-scope for structural integrity attached since the chillers are attached to safety-related piping. The drawings are correct as shown and the abandoned-in-place chillers are correctly scoped as 10 CFR 54.4(a)(2).

RAI 2.3.3.9-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-CH-5V149V00021 #1 and #2 coordinates G-8, depict an expansion tank vent line 1"CH1193XC7/1"CH2193XC7 and relief line 1"CH1193XC7/1"CH2193XC7 as not within the scope of license renewal.

The staff requests the applicant provide the basis for the exclusion of the expansion tank vent and relief piping and associated isolation valves from the scope of license renewal.

STPNOC Response

The reactor containment building chilled water expansion tanks (9V141VTS004 & 9V142VTS004) shown on LR-STP-CH-5V149V00021 #1 and #2 (G-8) have nitrogen blankets inside the tanks, and therefore the vent and relief lines contain a dry gas. Components containing dry gas are not within the scope of license renewal for 10 CFR 54.4(a)(2) spatial interaction.

RAI 2.3.3.9-03

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-CH-6V109V00010 #1 and #2 coordinates B-5, depict an expansion tank within the scope of license renewal for 10 CFR 54.4(a)(2). The expansion tank has vent lines 1"CH1288XC7/1"CH2188XC7 and relief line 1"CH1194XC7/1"CH2194XC7 which are depicted as not within the scope of license renewal.

The staff requests the applicant provide the basis for the exclusion of the expansion tank vent and relief piping and associated isolation valves from the scope of license renewal.

STPNOC Response

Reactor containment building chilled water expansion tanks (9V141VTS003 & 9V142VTS003) shown on LR-STP-CH-6V109V00010 #1 and #2, location B-5 have nitrogen blankets inside the tanks, and therefore the vent and relief lines contain a dry gas. Components containing dry gas are not within the scope of license renewal for 10 CFR 54.4(a)(2) spatial interaction.

Section 2.3.3.20 Standby Diesel Generator and Auxiliaries

RAI 2.3.3.20-01

In LRA Section 2.1 the applicant states that its screening process was used to identify the passive, long-lived structures and components within the scope of license renewal and subject to AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

LRA drawings LR-STP-DG-5Q159F22540 #1 and #2 coordinates E-3, E-5, and E-8, depict turbo housing components within the scope of license renewal for 10 CFR 54.4(a)(1). The turbo housing component was not included in AMR Table 2.3.3-20.

The staff requests the applicant provide the basis for excluding the turbo housing component type from LRA Table 2.3.3-20.

STPNOC Response

The turbocharger housings (3Q151MTU0134, 3Q151MTU0234, 3Q151MTU0334, 3Q152MTU0134, 3Q152MTU0234, 3Q152MTU0334, and subcomponents -1 & -2) are evaluated as component type "Blower" in LRA Tables 2.3.3-20 and 3.3.2-20 with a pressure boundary (PB) intended function.

RAI 2.3.3.20-02

In LRA Section 2.1 the applicant states that its screening process was used to identify the passive, long-lived structures and components within the scope of license renewal and subject to AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

LRA drawings LR-STP-DG-5Q159F22540 #1 and #2 coordinates F-2, F-5, and F-7, depict standpipe tank components within the scope of license renewal for 10 CFR 54.4(a){1) that provide a pressure boundary function. The standpipe tank component was not included in LRA Table 2.3.3-20.

The staff requests the applicant provide the basis for excluding the standpipe tank component type from LRA Table 2.3.3-20.

STPNOC Response

The standpipe components (3Q151MTS0138, 3Q151MTS0238,3Q151MTS0338, 3Q152MTS0138, 3Q152MTS0238, 3Q152MTS0338) are evaluated as component type "piping" in LRA Tables 2.3.3-20 and 3.3.2-20 with a pressure boundary (PB) intended function.

RAI 2.3.3.20-03

In LRA Section 2.1 the applicant states that its screening process was used to identify the passive, long-lived structures and components within the scope of license renewal and subject to AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

LRA drawings LR-STP-DG-5Q159F22546 #1 and LR-STP-DG-5Q159F22546 #2 coordinates F-2, F-5, and F-7, depict starter air receiver tank components within the scope of license renewal for 10 CFR 54.4(a)(1) that provide a pressure boundary function. The starter air receiver tank component was not included in AMR Table 2.3.3-20.

The staff requests the applicant provide the basis for excluding the starter air receiver tank component from LRA Table 2.3.3-20.

STPNOC Response

Starting air receivers (3Q151MTS0134, 3Q151MTS0234, 3Q151MTS0334, 3Q151MTS0434, 3Q151MTS0534, 3Q151MTS0634, 3Q152MTS0134, 3Q152MTS0234, 3Q152MTS0334, 3Q152MTS0434, 3Q152MTS0534, 3Q152MTS0634) are evaluated as component type "accumulator" in LRA Tables 2.3.3-20 and 3.3.2-20 with a pressure boundary (PB) intended function.

RAI 2.3.3.20-04

In LRA Section 2.1 the applicant states that its screening process was used to identify the passive, long-lived structures and components within the scope of license renewal and subject to AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

The staff reviewed LRA drawings LR-STP-DG-5Q159F22542 #1 and #2 and LR-STP-DG-5Q19F22543 #1 and #2 to locate the diesel lube oil reservoir tanks. The staff was unable to locate them.

The staff requests the applicant clarify whether or not there are diesel lube oil reservoir tanks in the system, and if they are, explain if they are in scope and where they are located.

STPNOC Response

The diesel generator lube oil system is a wet sump oiling system, and does not contain separate lube oil reservoir tanks.

RAI 2.3.3.20-05

In LRA Section 2.1.2.2, the applicant indicates that it utilized the method of designating base-mounted components (e.g., pump, heat exchanger, tank, etc.) as equivalent anchors to establish the license renewal boundary as described in NEI 95-10, Appendix F. The applicant uses the termination symbol, F.4.a, on the LRA drawings to identify the seismic endpoints at these components.

LRA drawings LR-STP-DG-5Q159F22546 #1 and #2 coordinates E-2, E-4, E-5, and E-7, depict membrane dryers attached to 1" stainless steel piping within the scope of license renewal, with the termination symbols of F.4.a. However, during the Scoping and Screening Audit on May 16 through May 20, 2011, the staff identified ½"' copper piping attached downstream of the 1" stainless steel piping. The ½" copper piping is attached to the membrane dryers. The configuration of the ½" copper piping on the membrane dryers does not appear to meet the description of base-mounted components as described in NEI-95-10, Appendix F.

The staff requests the applicant provide the basis for designating the membrane dryers as base-mounted components with the physical configuration as described above.

STPNOC Response

The LRA incorrectly designates the membrane dryers as F.4.a, base-mounted terminal components shown on boundary drawings LR-STP-DG-5Q159F22546 #1 and #2. The 1/2-inch copper tubing will be credited as a flexible connection per NEI 95-10 F.4.b, such that loads are not transferred through the tubing to the downstream safety-related piping. As a result, the membrane dryers will be removed from the scope of license renewal.

Boundary drawings LR-STP-DG-5Q159F22546 #1 and #2 will be revised to correctly show the 10 CFR 54.4(a)(2) terminations at the 1-inch stainless steel piping to 1/2-inch copper tubing. LRA Tables 2.3.3-20 and 3.3.2-20, and Section 2.3.3.20 will also be revised to remove the component type "dryer", and Section 2.3.3.20 will be revised to remove air dryers from the system description.

RAI 2.3.3.22-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to aging management review (AMR) by reviewing the results of the screening of components within the license renewal boundary.

For the drawing locations/lines identified in the table below, the pipe sections on the main drawings are shown as within the scope of license renewal but are shown as not within the scope of license renewal on the continuation drawings.

(LRA) Section/Drawing Number & Location	Continuation Piping/Drawing Number
LR-STP-WL-7R309F05024#1 and #2 coordinates G-6	2" piping (CV1259UD7 and CV2259UD7) on LR-STP-CV-5R179F05009#1 and #2 coordinates A-8
LR-STP-WL-5R309F05022#1 and #2 coordinates E-6	1" piping on LR-STP-RC-5R149F05004#1 and #2 coordinates F-6
LR-STP-WL-7R309F05023#1 and #2 coordinates A-2	3" piping (WL1048WG7/3"WL2048WG7) on LR-STP-WL-7R309F90001#1 and #2 coordinates E-8

The staff requests the applicant to provide the basis for the change in scoping classification for these pipe sections.

STPNOC Response

Item #1 - LR-STP-WL-7R309F05024#1/#2, G-6 continuation:

Boundary drawings LR-STP-WL-7R309F05024#1 & #2 (G-6) inadvertently omit an SI termination symbol. The downstream components shown on boundary drawings LR-STP-CV-5R179F05009#1 & #2 (A-8) are in a room that does not contain safety-related components. The components are correctly not highlighted on boundary drawings LR-STP-CV-5R179F05009#1 & #2 (A-8).

Boundary drawings LR-STP-WL-7R309F05024#1 & #2 (G-6) will be updated to add an SI termination symbol prior to the continuation to boundary drawings LR-STP-CV-5R179F05009#1 & #2 (A-8).

Item #2 - LR-STP-WL-5R309F05022#1/#2, E-6 continuation:

Boundary drawings LR-STP-WL-5R309F05022#1 & #2 (E-6) incorrectly highlight the piping downstream of valve WL1501 red for spatial interaction. The piping is not in-scope and an SI termination symbol should be located at valve WL1501. The piping is not in-scope based on both the Reactor Coolant Drain Tank (RCDT) and Pressure Relief Tank (PRT) having nitrogen blankets and being evacuated by the connections to the vacuum degassing system thereby establishing a dry gas atmosphere as an internal environment.

Boundary drawings LR-STP-WL-5R309F05022#1 & #2 (E-6) will be updated to remove the red highlighting from the piping downstream of valve WL1501 and to add an SI termination symbol at valve WL1501.

Item #3 - LR-STP-WL-7R309F05023#1/#2, A-2 continuation:

Boundary drawings LR-STP-WL-7R309F05023#1 & #2 (A-2) 3" piping WL1048WG7/3"WL2048WG7 continuation to boundary drawings LR-STP-WL-7R309F90001#1 & #2 (E-8) should be highlighted red until terminated for spatial interaction. Boundary drawing LR-STP-WL-7R309F90001#2 (E-8) correctly shows the piping highlighted red with an SI termination symbol; however, boundary drawing LR-STP-WL-7R309F90001#1 (E-8) inadvertently omits the red highlighted piping. The components on boundary drawing LR-STP-WL-7R309F90001#1 (E-8) are in-scope for 10 CFR 54.4(a)(2) spatial interaction.

Boundary drawing LR-STP-WL-7R309F90001#1 (E-8) will be updated to highlight the in-scope components red for 10 CFR 54.4(a)(2) spatial interaction.

RAI 2.3.3.22-02

In LRA Section 2.1, the applicant indicates that nonsafety-related SSCs attached to safety-related SSCs are within the scope of license renewal for 10 CFR 54.4(a)(2) up to the first seismic anchor beyond the safety/nonsafety interface.

During its review of the liquid waste processing system drawings, the staff could not locate seismic anchors on the following nonsafety-related piping sections, which are depicted as in scope of license renewal for 10 CFR 54.4(a)(2), and directly connected to safety-related valves.

Non-Safety/Safety Interface Location	Description
LR-STP-WL-7R309F05024#1 and #2 coordinates H-6	2" piping (WL1401WG7/2"WL2401WG7) connected to 3" line piping (WL1081WG7/WL2081WG7) which in turn is connected to safety-related piping including 2"CV1034PB3/2"CV2034PB3
LR-STP-WL-5R309F05022#1 and #2 coordinates E-6	Piping from drawing LR-STP-RC-5R149F05001#1 and #2 connected to valves FV3400

The staff requests the applicant provide the locations of the seismic anchors for the above examples.

STPNOC Response

Item 1

Piping 2"CV1034PB3 to safety-related valve CV133A connects to non safety-related piping 2"WL1089WG7 & 2"WL2089WG7 on boundary drawings LR-STP-WL-7R309F05024#1 & #2 (location G-7). All structural integrity attached terminations on drawings LR-STP-WL-7R309F05024#1 & #2 (location G-7) for valve CV133A were evaluated and found to be correct except for the following 10 CFR 54.4(a)(2) lines:

- 2"WL1093WG7/2"WL2093WG7
- 2"WL1094WG7/2"WL2094WG7, and
- 2"WL1401WG7/2"WL2401WG7.

No structural integrity attached terminations are shown on the drawings for these lines.

After further review of these piping lines, equivalent anchors (per "F.4.4" of NEI 95-10 Appendix F) were found along pipe 3"WL1081WG7/3"WL2081WG7 between the branch lines of 2"WL1093WG7/2"WL2093WG7 and 2"WL1094WG7/2"WL2094WG7 and on pipe 2"WL1094WG7/2"WL2094WG7. Piping downstream of these equivalent anchors will no longer be in scope for structural integrity attached; therefore, the seismic anchor symbols currently shown are no longer required and will be removed from the drawings.

The piping downstream of the equivalent anchor on 3"WL1081WG7/3"WL2081WG7 remains within the scope of license renewal for spatial interaction. Spatial interaction termination symbols (hexagons) were inadvertently omitted from piping lines 2"WL1093WG7/2"WL2093WG7, 2"WL1094WG7/2"WL2094WG7, and 2"WL1401WG7/2"WL2401WG7.

Boundary drawings LR-STP-WL-7R309F05024#1 & #2 will be revised to depict structural integrity attached terminations for pipe lines 2"WL1094WG7/2"WL2094WG7 and 2"WL1081WG7/2"WL2081WG7. The boundary drawings will also be revised to add the spatial interaction termination symbols (hexagons) to piping lines 2"WL1093WG7/2"WL2093WG7, 2"WL1094WG7/2"WL2094WG7, and 2"WL1401WG7/2"WL2401WG7.

Item 2

The NSR portion of the SR/NSR interface on LR-STP-WL-5R309F05022#1at F-7 begins with the solid line next to the dashed valve FV3400. Continuing along the NSR portion of this piping, all branches are appropriately terminated with an equivalent anchor except two locations. These locations are C-8 (pipe 4"RC1041UD7) and B-2 (pipe 3"RC1034UD7), with piping continuing to the pressurizer relief tank (PRT) on boundary drawings LR-STP-RC-5R149F05004#1 & #2 (E-5). The PRT serves as an appropriate F.4.a base-mounted component. The PRT and the associated piping are in-scope for license renewal, but a terminal component was inadvertently omitted at the PRT.

Boundary drawings LR-STP-RC-5R149F05004#1 & #2 will be updated to add an F.4.a termination symbol (base-mounted component) to the PRT.

RAI 2.3.3.22-03

License renewal rule 10 CFR 54.21(a)(1) requires applicants to list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

License renewal drawing LR-STP-WL-7R309F90001 #2 coordinates D-1, C-4, C-7, E-7 and E-8, depict portions of several lines as within the scope for license renewal for 10 CFR 54.4(a)(2). However, similar lines on LRA drawing LR-STP-WL-7R309F90001 #1 are shown as not within the scope of license renewal.

The staff requests the applicant to clarify the difference in scoping classification of the lines in question.

STPNOC Response

The Unit 1 boundary drawing LR-STP-WL-7R309F90001#1 inadvertently omits the red highlighting between the SI termination symbols for spatial interaction. The Unit 2 boundary drawing correctly shows the scoping boundaries for license renewal, and the components from both units are in scope.

Boundary drawing LR-STP-WL-7R309F90001#1 will be updated to highlight the six piping sections (locations D-1, C-4, C-7, E-7, E-8, and H-8) red for 10 CFR 54.4(a)(2) spatial interaction to agree with boundary drawing LR-STP-WL-7R309F90001#2.

RAI 2.3.3.22-04

LRA drawing LR-STP-SYMBOLS contains a component coloring scheme for identifying the pipe sections that are within the scope of license renewal. This drawing also contains symbols to identify 10 CFR 54.4(a)(2) terminations.

LRA drawing LR-STP-WL-7R309F90001#1 contains 10 CFR 54.4(a)(2) termination symbols. However, no pipe sections or equipment are identified as within the scope of license renewal.

The staff requests the applicant to identify the pipe sections and any components that are within the scope of license renewal.

STPNOC Response

The Unit 1 boundary drawing LR-STP-WL-7R309F90001#1 inadvertently omits the red highlighting between the SI termination symbols for spatial interaction. The Unit 2 boundary drawing correctly shows the scoping boundaries for license renewal, and the components from both units are in scope.

Boundary drawing LR-STP-WL-7R309F90001#1 will be updated to highlight the six piping sections (locations D-1, C-4, C-7, E-7, E-8, and H-8) red for 10 CFR 54.4(a)(2) spatial interaction to agree with boundary drawing LR-STP-WL-7R309F90001#2.

Section 2.3.3.23 Radioactive Vents and Drains

RAI 2.3.3.23-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-ED-5Q069F05030 #1 and #2 coordinates A-7 and F-4 depict Mech. Aux. Bldg. Elevator No. 5 Sump Pump 9O061NPA115A and Fuel Handling Building Sump No.3 sump pump 9O061NPA109A casing and discharge piping as not within the scope of license renewal. However, the same drawings depict similar sump pumps and their associated casings and discharge piping as within the scope of license renewal for 10 CFR 54.4(a)(2).

The staff requests the applicant provide the basis for excluding the pump No. 9O061NPA115A casings and discharge piping from the scope of license renewal.

STPNOC Response

Mechanical Auxiliary Building elevator No. 5 sump pump 9Q061NPA115A is located in a room that contains no safety-related components, so no 10 CFR 54.4(a)(2) spatial interaction exists in that sump area. The SI hexagon is appropriately shown.

The Fuel Handling Building Sump No. 3 sump pump 9Q061NPA109A is located in a room that contains no safety-related components so no 10 CFR 54.4(a)(2) spatial interaction exists in that sump area. The SI hexagon is appropriately shown.

RAI 2.3.3.23-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-ED-7Q069F90016 #1 and #2 coordinates D-1, depict ten 3" pipe sections (ED1120TC7) within the scope of license renewal continuing to LRA drawings LR-STP-ED-5Q069F05030 #1 and #2 coordinates E-4, where they are shown as not within the scope of license renewal.

The staff requests the applicant provide the basis for the difference in scoping classification of these pipe sections.

STPNOC Response

The green highlighting shown on boundary drawings LR-STP-ED-7Q069F90016#1 & #2 indicates drain components within the scope of license renewal for 10 CFR 54.4(a)(3) only. Therefore, a 10 CFR 54.4(a)(2) evaluation is not required for structural integrity attached.

The continuation piping on boundary drawings LR-STP-ED-7Q069F90016#1 & #2 (location C-1/D-1) is inadvertently highlighted red for spatial interaction. Boundary drawings LR-STP-ED-5Q069F05030#1 and #2 (location E-5) correctly show an SI hexagon indicating termination of spatial interaction prior to the piping continuation to boundary drawings LR-STP-ED-7Q069F90016#1 & #2 (location C-1/D-1) because the piping is routed from a room containing safety-related equipment to a room that does not contain safety-related equipment.

Boundary drawings LR-STP-ED-7Q069F90016#1 & #2 (location C-1/D-1) will be updated to remove the red highlighting from lines 3ED1120TC7 and 3ED2120TC7.

Section 2.3.3.26 Radiation Monitoring (Area and Process) Mechanical

RAI 2.3.3.26-01

In LRA Section 2.1 the applicant states that its screening process was used to identify the passive, long-lived structures and components within the scope of license renewal and subject to AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

LRA drawings LR-STP-HE-5V119V250003 #1 and #2 coordinates F-5, D-5, and B-5, depict carbon filter spray nozzles. The spray nozzle component type is not included in AMR Table 2.3.3-26.

The staff requests the applicant provide the basis for excluding the spray nozzle component type from LRA Table 2.3.3-26.

STPNOC Response

The carbon filter spray nozzles are in-scope for fire protection. The nozzles are not included in Tables 2.3.3-26 or 2.3.3-10 but have been scoped as fire protection and are included in Table 2.3.3-17. The carbon filter spray nozzles are generic components with a component type of "piping" with an intended function of "spray."

2.3.4 Steam and Power Conversion Systems

Section 2.3.4.1 Main Steam

RAI 2.3.4.1-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-MS-5S109F00016 #1 and #2 coordinates C-6, E-6, F-6, and H-6, depict piping downstream of the silencers as not within the scope of license renewal (total of 8 examples). These pipe sections appear to be part of the main steam system, which is depicted as being within the scope of license renewal for 10 CFR 54.4(a)(2).

The staff requests the applicant provide the basis of the scoping classification of these pipe sections.

STPNOC Response

Boundary drawings LR-STP-MS-5S109F00016#1/#2 inadvertently do not show the small piece of piping that extends from the silencers as in scope for 10 CFR 54.4(a)(2). The silencer piping both inside and outside the building is within the scope of license renewal.

Boundary drawings LR-STP-MS-5S109F00016#1 & #2 (locations C-6, E-6, F-6, and H-6) will be updated to highlight the piping downstream of the silencers red for 10 CFR 54.4(a)(2).

RAI 2.3.4.1-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-MS-5S101Z51002 and LR-STP-MS-5S102Z51002, lists many components of the main steam power operated relief valve - hydraulic system along the bottom of the drawing. However, the desiccant breather is not listed in LRA Table 2.3.4-1.

The staff requests that the applicant provide the basis for excluding the desiccant breather component type from LRA Table 2.3.4-1.

STPNOC Response

The desiccant breather is included in the scope of license renewal. Component type "filter" includes the dessicant breather component which is included in Table 2.3.4-1. However, upon further review it was noted that the breather was inadvertently identified as steel. The breather is actually made of stainless steel. Adding a stainless steel filter with a lube oil internal environment and plant indoor air external environment will change Table 3.4.2-1.

A new component line will be added for a "stainless steel filter with a lube oil internal environment and plant indoor air external environment" for the main steam system. Table 3.4.2-1 will be updated to reflect the additional filter component.

Section 2.3.4.2 Auxiliary Steam System and Boilers

RAI 2.3.4.2-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-WL-5R309F05027 #2 coordinates G-4, depicts 2" piping WL2586XC7 within the scope of license renewal under 10 CFR 54.4(a)(2) continuing to

LR-STP-WL7R309F05026 #2 coordinates E-6, where it is depicted as not within the scope of license renewal.

The staff requests the applicant provide the basis for the different scoping classifications for this pipe section.

STPNOC Response

Boundary drawing LR-STP-WL-5R309F05027#2 inadvertently omits a spatial interaction termination symbol at location G-4 at the continuation for the 2" piping WL2586XC7. The piping (2" WL2586XC7) leaves room 67C that contains safety-related components and enters room 53B with no safety-related components.

Boundary drawing LR-STP-WL-5R309F05027#2 (location G-4) will be updated to add an SI hexagon terminal component symbol to 2" piping WL2586XC7 prior to the off sheet connector to boundary drawing LR-STP-WL-7R309F05026#2.

Section 2.3.4.4 Demineralizer Water (Make-Up)

RAI 2.3.4.4-01

LRA drawing LR-STP-SYMBOLS contains a note for the 10 CFR 54.4 (a)(2) termination symbol, F.4.e, which states: "Point where Buried piping exits the ground - buried portion of pipe in scope."

LRA drawings LR-STP-DW-5S1999F05034 #1 and #2 coordinates B-6 depict 10 CFR 54.4(a)(2) lines 4" DW0018WD9 continuing to drawing LR-STP-NL-6S190F00009 coordinates E-2 and B-2, where the underground piping is shown as not within the scope of license renewal. The termination symbol F.4.e at coordinates B-6 indicates that all underground piping is within the scope of license renewal. Also, during the Scoping and Screening Audit on May 16 through May 20. 2011, the applicant indicated that there were similar instances in which portions of buried piping in other systems were removed from scope of license renewal.

The staff requests the applicant provide the basis for not including the entire underground portion of the pipe section described above within the scope of license renewal. The staff also requests the applicant identify and provide the basis for the other portions of buried piping removed from scope of license renewal.

STPNOC Response

The termination symbol and location used for pipe 4DW0018WD9 on boundary drawing LR-STP-DW-5S199F05034#1 & #2 (location B-6) is incorrect. The piping and components in this pipe line are not in-scope for 10 CFR 54.4(a)(2). The termination should be a hexagonal "SI" symbol where the piping enters the ground in the MEAB. Therefore, the termination location and termination symbol on boundary drawings LR-STP-DW-5S199F05034#1 & #2 are incorrect.

Boundary drawings LR-STP-DW-5S199F05034#1 & #2 (location B-6) will be updated to replace the F.4.e triangle with the hexagon "SI" symbol and show the termination at the point the piping goes underground. Pipe 4DW0018WD9 will be changed to black indicating it is not within the scope of license renewal.

Buried piping was re-evaluated in February 2011 as part of implementing buried piping requirements associated with GALL Rev 2 AMP XI.M41. The re-evaluation allowed removal of several sections of buried piping from the scope of license renewal. As a result, boundary drawing LR-STP-NL-6S190F00009 is no longer needed since the highlighted piping on the drawing is no longer in-scope.

Section 2.3.4.6 Auxiliary Feedwater

RAI 2.3.4.6-01

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-AF-5S142F00024-1 coordinates H-7 depicts Auxiliary Feedwater Pump No. 24 3S142MPA04 1" vent piping and associated isolation valves AF0129 and AF0130 as not within the scope of license renewal. However, the same drawing depicts the pump vent lines and associated isolation valves coordinates F-7. D-7, and B-7, for Auxiliary Feedwater Pumps No. 21 3S142MPA01, No. 22 3S142MPA02, and No. 23 3S142MPA03 as within the scope of license renewal for 10 CFR 54.4(a)(1) or (a)(3).

The staff requests the applicant provide the basis for excluding pump No. 24 3S142MPA04 vent piping and associated isolation valves from the scope of license renewal.

STPNOC Response

The auxiliary feedwater Pump No. 24 3S142MPA04 1" vent piping and associated isolation valves AF0129 and AF0130 shown on Boundary Drawing LR-STP-AF-5S142F00024-1 are safety-related but are inadvertently highlighted black (denotes not in scope). Safety-related valves AF0129 and AF0130 and upstream piping are currently in scope as 10 CFR 54.4(a)(1) and should be highlighted green. The non-safety-related vent piping downstream of valves AF0129 and AF0130 is in scope as 10 CFR 54.4(a)(2) and should be highlighted red.

Boundary drawing LR-STP-AF-5S142F00024-1 (location H-7) will be updated to highlight valves AF0129 and AF0130 and upstream piping "green" for 10 CFR 54.4(a)(1) and highlight the non-safety-related vent piping downstream of valves AF0129 and AF0130 "red" for 10 CFR 54.4(a)(2).

RAI 2.3.4.6-02

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawing LR-STP-AF-5S142F00024-1 coordinates H-7, F-7, D-7, and B-7, depict Auxiliary Feedwater Pump 1" vent piping and associated isolation valves. However, Unit 1 LRA drawing LR-STP-AF-5S141F00024-1 coordinates H-7, F-7, D-7 and B-7 do not include Auxiliary Feedwater Pump vent piping details.

The staff requests the applicant to confirm that there are no vent piping and associated isolation valves on the Unit 1 Auxiliary Feedwater Pumps.

STPNOC Response

There are no vent valves installed on the Unit 1 Auxiliary Feedwater Pumps. The Unit 1 piping and instrumentation drawing 5S141F00024 confirms that the vent piping and valves for the Auxiliary Feedwater Pumps are not installed. In addition, the South Texas Project Mechanical Equipment Database (MED) confirms that the vent valves are not installed.

RAI 2.3.4.6-03

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included within the scope of license renewal. The staff confirms the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

LRA drawings LR-STP-AF-5S141F00024-1 and LR-STP-AF-5S142F00024-1 coordinates G-7, depict the auxiliary feedwater pump turbine attached to the turbine-driven auxiliary feedwater pump, which are both within the scope of license renewal under 10 CFR 54.4(a)(1). However, the LRA drawings also depict solid black lines in between the two components, which are not highlighted in scope of license renewal.

The staff requests the applicant provide the basis for excluding these black lines from the scope of license renewal.

STPNOC Response

Boundary drawings LR-STP-AF-5S141F00024-1 and LR-STP-AF-5S142F00024-1 (G-7) depict the auxiliary feedwater pump turbine attached to the turbine-driven auxiliary feedwater pump by a mechanical shaft. The pump, turbine, and mechanical shaft are all safety-related and are in-scope as 10 CFR 54.4(a)(1). The shaft is integral to the pump and is scoped as part of the pump. The shaft is an active non-pressure boundary component, and therefore does not require aging management review. The shaft should have been highlighted green but the green highlight was inadvertently omitted. Boundary drawings LR-STP-AF-5S141F00024-1 and LR-STP-AF-5S142F00024-1 will be revised to highlight the in-scope turbine-driven auxiliary feedwater pump shaft green for
10 CFR 54.4(a)(1).