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September 29, 2011
U7-C-NINA-NRC-110120

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

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
COLA Correction

References:

1. Letter from Scott Head to the Document Control Desk, "Submittal of Combined License Application Revision 6," U7-C-NINA-NRC-110111, August 30, 2011
2. Letter from Greg Gibson to the Document Control Desk, "Response to Requests for Additional Information," ABR-AE-08000052, July 15, 2008 (ML082040684)

As mentioned in the Summary of Changes in the submittal of COLA Revision 6 (Reference 1), Nuclear Innovation North America LLC (NINA) is providing a COLA markup to correct an administrative error involving an incomplete markup that was made in COLA Revision 4 as part of the response to Environmental RAI 7.1-2 (Reference 2). This markup includes changes to COLA Part 7 (Sections 3.0 and 5.0), COLA Part 2 Section 15.6, and COLA Part 2 Section 19.2. The changes identified in the attachment will be implemented in COLA Revision 7.

There are no commitments in this letter.

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

DO91
NRO

STI 32962805

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

Executed on 9-29-11



Mark McBurnett

Senior Vice President, Oversight & Regulatory Affairs
Nuclear Innovation North America LLC

jet

Attachment:

COLA Correction

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

(electronic copy)

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Cleanup Water Line Break Meteorology and Dose Results

STP's response to Environmental Report RAI 7.1-2, provided in Letter ABR-AE-08000052, July 2008, addressed errors in ABWR DCD Table 15.6-18 and the apparent reasons why the reported thyroid doses were incorrect. The response stated that Table 15.6-18 would be revised to report corrected values for the thyroid doses based on the activity releases reported in DCD Table 15.6-17. The corrections to Table 15.6-18 were made in COLA Rev. 4. These changes were made under standard departure STD DEP 15.6-1; however, this departure was inadvertently not completely implemented. The following COLA markup completes the implementation of this departure by providing a departure evaluation and correcting the departure tables in COLA Part 7. In addition, one dose number was not transposed properly in COLA Rev. 4, and it is corrected and shown in gray shading in the table. These changes will be made in COLA Rev. 7. As mentioned, all changes from COLA Rev. 6 are shown in gray shading.

The following departure evaluation is added to COLA Part 7, Section 3.0.

STD DEP 15.6-1, Clean Up Water Line Break Meteorology and Dose Results

Description

DCD Section 15.6, Table 15.6-18, Clean Up Water Line Break Meteorology and Dose Results provides accident meteorological dispersion factors, the thyroid dose, and whole body dose. The DCD Table lists doses for four different χ/Q values. For the first listed χ/Q value, the thyroid and whole body doses differ by a factor of approximately 100; however, for the other χ/Q values, the reported thyroid doses do not differ by a factor of approximately 100. In fact, the thyroid doses are reported as being the same as the whole body doses. This is clearly in error. The thyroid doses have been recalculated based on the activity releases reported in DCD Table 15.6-17 and the χ/Q values in DCD Table 15.6-18.

Evaluation Summary

This departure to correct the thyroid dose values presented in Table 15.6-18 of the STP 3&4 FSAR has been evaluated pursuant to the requirements in 10 CFR 52, Appendix A, Section VIII.B.5. This departure does not change any Tier 1, Tier 2* information, the Technical Specifications, any underlying design or other operational requirements. It does not change any plant physical features, SSCs important to safety, or fission product barriers. Any previously evaluated accident is only minimally impacted, and the possibility for an accident of a different type is not created. Also, it does not affect any method used for evaluation in establishing the design bases or in the safety analyses. This departure does not affect any feature for mitigation of an ex-vessel severe accident. For the same reason, and because there is no effect on any event, operation, or SSC function, the change does not create a different ex-vessel accident scenario. Therefore, this change does not require prior NRC approval.

STP 3&4 COLA Revision 6, Part 7, Section 5.0 will be revised as shown below. Gray highlighting shows the changes.

Table 5.0-1 Tier 2 Departures and All Affected Sections

Departure Numbers	Sections
STD DEP 14.2-1	Tier 2 Section 14.2
STD DEP 15.6-1	Tier 2 Section 15.6
STD DEP 16.2-1	Tier 2 Section 16.2.0

Table 5.0-2 Tier 2 Sections and All Affected Departure Numbers

Sections	Departure Numbers
Tier 2 Section 15.2	STD DEP 8.3-1
Tier 2 Section 15.2	STD DEP T1 2.3-1
Tier 2 Section 15.6	STD DEP 15.6-1
Tier 2 Section 15.7	STD DEP 11.3-1
Tier 2 Section 15.7	STD DEP T1 2.15-1
Tier 2 Appendix 15A	STD DEP T1 2.14-1
Tier 2 Appendix 15B	STD DEP 7.7-1
Tier 2 Appendix 15B	STD DEP T1 3.4-1
Tier 2 Appendix 15E	STD DEP T1 3.4-1

STP 3&4 COLA Revision 6, Part 2, Tier 2, Section 15.6, Table 15.6-18 will be revised as shown below. Gray highlighting shows the changes.

Table 15.6-18 Clean Up Water Line Break Meteorology* and Dose Results

Meteorology (s/m ³)	Thyroid Dose (Sv)	Whole Body Dose (Sv)
2.29E-02	3.0E-1	2.8E-3
1.37E-03	1.7E-4 1.8E-2	1.7E-4
1.18E-03	1.5E-4 1.5E-3 1.5E-2	1.5E-4
2.19E-04	2.7E-5 2.8E-3	2.7E-5

* Meteorology calculated using Regulatory Guide 1.145 for a ground level 1.0 m/s, F stability.
 "Max" = maximum meteorology to meet 10% of 10CFR100 limits.

STP 3&4 COLA Revision 6, Part 2, Tier 2, Section 19.2, Table 19.2-2 will be revised as shown below. Gray highlighting shows the changes.

Table 19.2-2 PRA Assessments of STP COLA Departures from ABWR DCD (Continued)

Departure Number	Design Basis	US ABWR/STP Design Basis	Potential Impact on PRA [STP COLA Section]
STD DEP 12.3-3 Steam Tunnel Blowout Panels	The blowout panels for the steam tunnel are located in the relatively inaccessible section of the RHR heat exchanger shielded cubicle which are controlled access areas.	The design does not have blowout panels in the steam tunnel. The main steam tunnel is vented to the turbine building.	No effect on the PRA, not modeled.
STD DEP 12.3-4 Alarm Capability for Area Radiation Monitors (ARMs)	--	The ARMs will have alarm capability and five additional monitors are required in the Reactor Building.	No effect on the PRA, not modeled.
STD DEP 14.2-1 Control Rod Drive Friction Testing Requirement	--	Normal control rod positioning is accomplished by an electrical motor. Mechanical binding of a CRD will result in blade separation from the ball nut which would be detected by permanently installed instrumentation. The CRDs are easily monitored for performance degradation during normal withdrawal; therefore periodic friction testing is not required.	No effect on the PRA, not modeled.
STD DEP 15.6-1 Clean Up Water Line Break Methodology and Dose Results	Apparent error in the Thyroid Dose values reported in Table 15.6-18.	No change to design basis.	No effect on the PRA, not modeled.
STD DEP 16.2-1 thru STD DEP 16.5-6 Technical Specifications Changes	See COLA Part 7 for changes.	See COLA Part 7 for changes.	No effect on the PRA, not specifically modeled.
STD DEP 18.4-1 Main Generator Synchronization Control Relocation	--	The controls required for the synchronization of the main generator have been relocated from the control console to the main control panel.	No effect on the PRA, not modeled.