

PROPRIETARY



Nuclear Innovation
North America LLC
4000 Avenue F, Suite A
Bay City, Texas 77414

October 5, 2011
U7-C-NINA-NRC-110122

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

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

The NRC Staff requested during several phone conversations that Nuclear Innovation North America LLC (NINA) provide additional Flow Induced Vibration information supporting review of the Combined License Application (COLA). Attached are revised or supplemental responses to a Request for Additional Information (RAI) related to COLA Part 2, Tier 2, Section 3.9.2 that address the Staff's requests.

Attachments 2 through 4 provide the revised or supplemental information to RAI question 03.09.02-49. Where there are COLA markups, they will be made at the first routine COLA update following NRC acceptance of the RAI response.

Please note that the information contained in Attachment 2 is considered proprietary to Westinghouse Electric Company, LLC and is supported by an affidavit signed by Westinghouse, the owner of the information. Attachment 3 contains the redacted (non-proprietary) version of this response. Attachment 4 contains an additional non-proprietary supplemental response. Attachment 1 provides the Westinghouse Application for Withholding Letter CAW-11-3256 and accompanying affidavit, Proprietary Information Notice, and Copyright Notice. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-11-3256 and should be addressed to J.A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

STI 32986075

When separated from the proprietary material (Attachment 2), this letter is not proprietary.

There are no commitments in this letter.

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

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

Executed on 10/5/11



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

jep

Attachments:

1. Westinghouse Application for Withholding letter CAW-11-3256 and Accompanying Affidavit, Proprietary Information Notice and Copyright Notice
2. RAI 03.09.02-49, Supplement 1, Revision 1 (Proprietary)
3. RAI 03.09.02-49, Supplement 1, Revision 1 (Redacted Non-Proprietary)
4. RAI 03.09.02-49, Supplement 2 (Non-Proprietary)

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

(electronic copy)

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Attachment 1

Westinghouse Application for Withholding letter CAW-11-3256
and Accompanying Affidavit, Proprietary Information Notice
and Copyright Notice



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USA

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WEC-NINA-2011-0026

CAW-11-3256

October 4, 2011

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WEC-NINA-2011-0026 P-Enclosure, "Response to RAI 03.09.02-49 Supplement 1,
Revision 1 for the Flow-Induced Vibration Program – South Texas Project Units 3 & 4"
(Proprietary)

The proprietary information for which withholding is being requested in the above-referenced document is further identified in Affidavit CAW-11-3256 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Nuclear Innovation North America (NINA).

Correspondence with respect to the proprietary aspects of this application for withholding or the accompanying affidavit should reference CAW-11-3256 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. F. Maurer'.

B. F. Maurer, Manager
ABWR Licensing

Enclosures

cc: T. Tai (NRC TWFN 6 D38M)

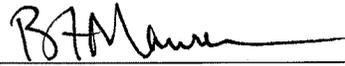
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF BUTLER:

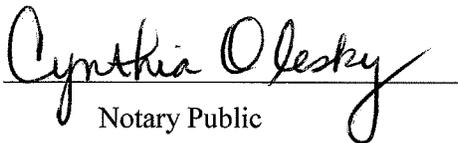
Before me, the undersigned authority, personally appeared B. F. Maurer, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



B. F. Maurer, Manager

ABWR Licensing

Sworn to and subscribed before me
this 4th day of October 2011



Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Cynthia Olesky, Notary Public
Manor Boro, Westmoreland County
My Commission Expires July 16, 2014
Member, Pennsylvania Association of Notaries

- (1) I am Manager, ABWR Licensing, in Nuclear Services, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

 - (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouse's

competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390; it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WEC-NINA-2011-0026 P-Enclosure, "Response to RAI 03.09.02-49 Supplement 1, Revision 1 for the Flow-Induced Vibration Program – South Texas Project Units 3 & 4" (Proprietary) for submittal to the Commission, being transmitted by Nuclear Innovation North America (NINA) letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is to assist the NRC in the review of the South Texas Project Units 3&4 flow induced vibration program.

This information is part of that which will enable Westinghouse to:

- (a) Assist the customer in obtaining NRC review of the Westinghouse flow-induced vibration program as applied to the STP 3&4 plants.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific flow-induced vibration program development for ABWR licensing basis applications.
- (b) Its use by a competitor would improve their competitive position in the design and licensing of a similar product for ABWR plants.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluations and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

Proprietary Information Notice

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

Copyright Notice

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

RAI 03.09.02-49, Supplement 1, Revision 1

QUESTION:

During the audit, STP presented sample pressure spectra measured on the sub-scale steam dryer. STP suggested that these pressure measurements can be scaled up to the full scale reactor size and operating conditions and then used to estimate the design dynamic loading on the dryer. After reviewing these sample pressure spectra, the NRC staff concluded that most of the pressure spectra measured on the sub-scale dryer do not exemplify the spectral characteristics of the pressure fluctuations measured on the Japanese dryer. Therefore, the staff advised STP that the use of pressure measurements from the sub-scale tests to estimate the STP dryer design load at full power level cannot be approved by the staff. STP was further advised to propose an alternative approach to demonstrate that the steam dryer can be operated safely at the planned maximum power level. In response, STP suggested the following alternative approach:

1. Comprehensive industrial experiences on ABWR dryers will be collected and submitted to NRC for review. The industrial experiences will be compiled for the reactors in Japan because these reactors are “identical” to the STP dryer and have been in operation for several years at conditions similar to those of the STP dryer.
2. A “best estimate” design load for the STP dryer will be developed from compilation of the results obtained from:
 - 15 pressure transducers on the sub-scale dryer
 - 3 pressure transducers on the Japanese dryer
 - 7 strain gages on the Japanese dryer
 - 4 accelerometers on the Japanese dryer.
3. The “best estimate” design load will be used to design the dryer, but the dryer will be instrumented with pressure transducers, strain gages and accelerometers to monitor the alternating stresses during the start-up measuring program.
4. During the start-up measurement program, the reactor load will not be increased beyond an approved power level (around 60% CLTP) until pressure measurements on the actual dryer are obtained and used to update the dryer load, stress margins and limit curves. Further power increases would proceed only if the updated stress margins allow.
5. STP will provide a comprehensive report explaining the methodology which will be used to estimate the dynamic dryer load from pressure measurements on the dryer during the start-up test program. The report will include validation tests together with expected bias errors and uncertainties. The SMT will be used to validate the methodology of load definition.

Westinghouse Non-Proprietary Class 3

RAI 03.09.02-49, Supplement 1, Revision 1
(Redacted Non-Proprietary)

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Attachment 3
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6. STP will also submit a comprehensive report documenting the FE dynamic model of the dryer and the method which will be used to estimate the minimum alternating stress ratio of the dryer at CLTP operating conditions. The report will include expected bias errors and uncertainties. In this report, the best estimate design load will be used to estimate the stress level of the dryer.

In order to confirm mutual understanding of the new approach being pursued by STP, the applicant is requested to:

- (a) confirm that the above detailed approach will be followed, or update the NRC staff if any deviations from this approach are expected.
- (b) submit comprehensive reports on: the industrial experiences of ABWRs; determination of the best estimate dryer load; validation of the procedure of load definition from pressure measurements on the dryer during start up tests; and FE stress analysis of the dryer based on the best estimate design load.

REVISED SUPPLEMENTAL RESPONSE:

The supplemental response was provided as a result of several discussions with the NRC staff reviewers after submittal of the revised response to document closure of Nuclear Innovation North America (NINA) actions in Letter No. U7-C-NINA-NRC-110088 dated June 30, 2011. After submittal of the supplemental response in Letter No. U7-C-NINA-NRC-1100112 dated August 24, 2011, additional discussion was held with NRC staff reviewers regarding clarifying the status of the dryer welds in Item (a) below. Changes from the original supplemental response are identified by change bars in the margin.

- a) WCAP-17385, Section 5.5.3.6: The NRC reviewers noted that this section of the WCAP indicates that []^{a,c} Validation of these assumptions was requested.

[

Westinghouse Non-Proprietary Class 3

RAI 03.09.02-49, Supplement 1, Revision 1
(Redacted Non-Proprietary)

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] ^{a,c}

[

] ^{a,c}

- b) WCAP-17385, Section 5.5.3.4: The NRC reviewers noted that the report states that dead-weight stress is included in the load combination [

] ^{a,c} Justification that thermal stresses under these boundary conditions [^{a,c} was requested.

[

] ^{a,c}

- c) WCAP-17385, Section 5.5.5.2: The NRC reviewers noted that the stress ratio of the dryer is calculated as:

Stress ratio = [

] ^{a,c} The staff requested justification for not considering any end-to-end uncertainty and bias for [^{a,c}

Westinghouse Non-Proprietary Class 3

RAI 03.09.02-49, Supplement 1, Revision 1
(Redacted Non-Proprietary)

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[

] ^{a,c} These assumptions assure that the stress evaluation provides conservative results.

d) WCAP-17370-P, Rev. 2, Section 6: NRC staff requested a clarification of the following statement, [

] ^{a,c}

The intent of this statement can be summarized as follows:

- The measurement plus an uncertainty factor must be less than the acceptance criteria.
- The uncertainty factor is defined as [

] ^{a,c}

The supplemental information provided in COLA Part 2, Tier 2, Subsection 3.9.2.4 will be revised to make the description consistent with the current approach as described in this RAI response and the associated WCAPs.

The changes to the STP 3&4 COLA are provided below. Changes to COLA Revision 6 are highlighted in gray shading.

3.9.2.4 Preoperational Flow-Induced Vibration Testing of Reactor Internals

The following standard supplement addresses Regulatory Guide (R.G.) 1.206, Rev. 0:

As discussed in Subsection 3.9.2.3, STP 3 reactor internals are classified as Prototype, and the STP 4 reactor internals are classified as non-prototype, Category I. In accordance with the requirement of Regulatory Guide 1.206 Section C.1.3.9.2.4 for prototype, Section 3.9.2.3 identifies the assessment program for STP 3 that addresses the flow modes, vibration monitoring and sensor types and locations, procedures and methods to be used to process and interpret the measured data, planned visual inspections, and planned comparisons of test results with analytical predictions. In addition, scale model tests will also be used for the development of the analyses of the steam dryers for acoustic loads. The approach for qualification of the STP 3 reactor internals, including the steam dryer, is as described in Reference 3.9-13.

For STP 4 reactor internals components, an inspection program will be implemented in lieu of a vibration measurement program as discussed in paragraph C.3.1.3 of Regulatory Guide 1.20. Subsection 3.9.2.3 identifies the assessment program for the STP 4 non-prototype.

Also, as discussed in Regulatory Guide 1.20, Rev. 3, the main steam lines in STP 3 and 4 will be instrumented with strain gages to provide measurements of pressure fluctuations due to flow-induced vibrations. The measurements will be used by the Acoustic Circuit Methodology to analytically predict the steam dryer flow-induced vibration loads. The predicted loads will then be used with a finite element model of the dryer to confirm the acceptability of the flow-induced vibration loads.

RAI 03.09.02-49, Supplement 2**QUESTION:**

During the audit, STP presented sample pressure spectra measured on the sub-scale steam dryer. STP suggested that these pressure measurements can be scaled up to the full scale reactor size and operating conditions and then used to estimate the design dynamic loading on the dryer. After reviewing these sample pressure spectra, the NRC staff concluded that most of the pressure spectra measured on the sub-scale dryer do not exemplify the spectral characteristics of the pressure fluctuations measured on the Japanese dryer. Therefore, the staff advised STP that the use of pressure measurements from the sub-scale tests to estimate the STP dryer design load at full power level cannot be approved by the staff. STP was further advised to propose an alternative approach to demonstrate that the steam dryer can be operated safely at the planned maximum power level. In response, STP suggested the following alternative approach:

1. Comprehensive industrial experiences on ABWR dryers will be collected and submitted to NRC for review. The industrial experiences will be compiled for the reactors in Japan because these reactors are “identical” to the STP dryer and have been in operation for several years at conditions similar to those of the STP dryer.
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In order to confirm mutual understanding of the new approach being pursued by STP, the applicant is requested to:

- (a) confirm that the above detailed approach will be followed, or update the NRC staff if any deviations from this approach are expected.
- (b) submit comprehensive reports on: the industrial experiences of ABWRs; determination of the best estimate dryer load; validation of the procedure of load definition from pressure measurements on the dryer during start up tests; and FE stress analysis of the dryer based on the best estimate design load.

SUPPLEMENTAL RESPONSE:

This second supplemental response is being provided as a result of a discussion with the NRC staff reviewers after submittal of the revised response to document closure of Nuclear Innovation North America (NINA) actions in NINA Letter No. U7-C-NINA-NRC-110088 dated June 30, 2011. In that discussion, the NRC staff indicated that the use of VT-3 inspections for the inspection of the STP Unit 4 dryer was not supported by the current industry technical guidance in BWRVIP-139-A, "BWR Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines." NRC staff reviewers indicated that the supporting information provided in WCAP-17257-P is not sufficient to warrant deviating from the guidance.

In response to this discussion, WCAP-17257-P will be revised to indicate that the STP Unit 4 steam dryer inspection will be performed consistent with the STP Unit 3 steam dryer inspection as described in WCAP-17370-P. Section 3.2 of WCAP-17257-P will be revised as shown below. These changes will be incorporated into the next revision of the WCAP.

No COLA changes are required as a result of this supplemental response.

3.2 STEAM DRYER INSPECTION

The steam dryer will be subjected to dynamic loading resulting from the steam flow turbulence, acoustic pressure pulsation and other sources of excitation during power operation. Hence, the steam dryer will undergo final inspection no later than the first refueling outage.

The inspection program for the STP Unit 4 steam dryer will be identical to that described in Section 5.2 of Reference 5.