

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

October 18, 2011 NOC-AE-11002747 File No.: G25

10 CFR 50.73 STI: 33000970

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

South Texas Project
Unit 2
Docket No. STN 50-499
Cancellation of Licensee Event Report 2-2010-004

Reference: Letter dated December 10, 2010, from L. W. Peter, STP Nuclear Operating

Company to NRC Document Control Desk, "Licensee Event Report 2-2010-004, Loss of the Train A Essential Cooling Water (ECW) System Due to a Loss of the ECW Intake Structure Ventilation Fan 21A" (NOC-AE-10002627) (ML103630407)

STP Nuclear Operating Company (STPNOC) submitted the referenced Unit 2 Licensee Event Report (LER) 2-2010-004 to address the loss of the Train A Essential Cooling Water (ECW) System due to a loss of the ECW intake structure ventilation fan 21A. Based on further review of the guidance provided in NUREG-1022, Revision 2, "Event Reporting Guidelines, 10 CFR 50.72 and 50.73," STP Nuclear Operating Company is withdrawing the referenced Licensee Event Report.

This event was originally considered reportable under 10 CFR 50.73(a)(2)(i)(B), as an operation or condition prohibited by Technical Specifications.

As discussed in the referenced LER, the Unit 2 Train A Essential Cooling Water (ECW) System was declared inoperable on October 28, 2010, due to a loss of the ECW intake structure ventilation fan 21A. The ventilation fan is a required support system for ensuring the operability of the Train A ECW System. The ECW System provides cooling for the Train A Engineered Safety Features (ESF) Standby Diesel Generator (SDG). Therefore, the Train A ESF SDG was also declared inoperable and Action b of Technical Specification (TS) 3.8.1.1 was entered. Action b of TS 3.8.1.1 requires that with a SDG inoperable, demonstrate the operability of the TS required A.C. offsite sources by performing Surveillance Requirement (SR) 4.8.1.1.1.a within 1 hour. A subsequent investigation discovered that the ECW System had been inoperable earlier than the time that the ventilation fan was initially discovered not to be running such that the performance of SR 4.8.1.1.1.a was not completed within the required TS time (the verification was not performed until approximately two and one half hours after the actual time the SDG became inoperable).

The guidance and examples provided in Section 3.2.2 of NUREG-1022, "Operation or Condition Prohibited by Technical Specifications," show that events to be considered reportable under this criterion are those that result in the equipment being incapable of performing its specified safety function for longer than permitted by the associated TS allowed outage time and shutdown time. Although the required action to perform the offsite A. C. power availability and alignment verification had not been completed within the required one-hour timeframe, the Train A safety systems were only inoperable for a period of 6 hours 30 minutes, which was well within their associated allowed outage times (the diesel generator has an allowed outage time of 14 days). Therefore, this condition is not considered reportable pursuant to 10 CFR 50.73(a)(2)(i)(B) and the subject Licensee Event Report is being withdrawn.

There are no commitments contained in this letter.

If there are any questions on this submittal, please contact either J. R. Morris at (361) 972-8652 or me at (361) 972-7566.

G. T. Powell

Vice President, Generation

JRM

CC:

(paper copy)

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

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

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

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

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

Balwant K. Singal U. S. Nuclear Regulatory Commission

John Ragan Chris O'Hara Jim von Suskil NRG South Texas LP

Kevin Pollo Richard Pena City Public Service

Peter Nemeth Crain Caton & James, P.C.

C. Mele City of Austin

Richard A. Ratliff
Texas Department of State Health
Services

Alice Rogers Texas Department of State Health Services