



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

October 19, 2011
NOC-AE-11002746
STI: 33000808

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Clarification to NRC Commitment Audit Report

Reference: NRC Letter dated September 7, 2011, from Balwant K. Singal, Nuclear Regulatory Commission to Edward D. Halpin, STP Nuclear Operating Company, "South Texas Project, Units 1 and 2 -Audit of the Licensee's Regulatory Commitment Management Program (TAC Nos. ME6058 and ME6059)" (ML112210658)

STP Nuclear Operating Company (STPNOC) submits this letter to address a statement made by the NRC in the referenced Commitment Audit Report. Observations and Recommendations Section 3.0 of the audit report contains the following statement:

The licensee agreed to identify the regulatory commitments in the margin area of the target documents (e.g. procedures) for easy traceability and to eliminate the potential for unintentional change to the commitment in future.

STPNOC agreed to consider the staff's recommendation, but did not agree to identify regulatory commitments by using indications in the margin of the target documents. Implementation of the staff's recommendation would entail a programmatic change and revision to a large number of procedures. Commitments are currently identified by including the commitment identifier in parentheses in the body of the target document and in the reference section. STPNOC considers this process to be effective and understood by station personnel. We do not believe an additional identifier in the margin would be a significant improvement.

There are no new commitments in this letter.

If there are any questions, please contact either Marilyn Kistler at 361-972-8385 or me at 361-972-7298.


A. Wayne Harrison
Manager, Licensing

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NRR

cc:
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