



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 4, 2012

LICENSEE: STP Nuclear Operating Company


FACILITY: South Texas Project

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALLS HELD ON NOVEMBER 30 AND DECEMBER 1, 2011, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND STP NUCLEAR OPERATING COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE SOUTH TEXAS PROJECT UNITS 1 AND 2 LICENSE RENEWAL APPLICATION – SET 9 (TAC. NOS. ME4936, ME4937)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held telephone conference calls on November 30 and December 1, 2011, to discuss and clarify the staff's requests for additional information (RAIs) concerning the South Texas Project, Units 1 and 2, license renewal application. The telephone conference calls were useful in clarifying the questions and issues for both staff and applicant.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the issues discussed with the applicant, including a brief description of the status of the items.

The applicant had an opportunity to comment on this summary.


John Daily, Senior Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos.: 50-498, 50-499

Enclosures:
As stated

cc w/encls: Listserv

TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
NOVEMBER 30 AND DECEMBER 1, 2011

November 30, 2011 Call	
<u>PARTICIPANTS</u>	<u>AFFILIATIONS</u>
John Daily	NRC
John Klos	NRC
Cliff Douth	NRC
Bill Holston	NRC
Kim Green	NRC
James Gavula	NRC
John Wise	NRC
Gary Warner	STARS COB
Ken Taplett	STPNOC
Jim Johnson	STPNOC
Al Saunders	STPNOC

December 1, 2011 Call	
<u>PARTICIPANTS</u>	<u>AFFILIATIONS</u>
John Daily	NRC
Michele Kichline	NRC
Gary Warner	STARS COB
Ken Taplett	STPNOC
Jim Johnson	STPNOC

REQUESTS FOR ADDITIONAL INFORMATION

LICENSE RENEWAL APPLICATION NOVEMBER 30 AND DECEMBER 1, 2011

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held telephone conference calls on November 30 and December 1, 2011, to discuss and clarify the following requests for additional information (RAIs) concerning the license renewal application (LRA).

The participants indicated that the calls were useful in clarifying the questions discussed.

RAI issues and discussions:

1. RAI B2.1.22-1 items:
 - a. Item 1: The applicant's response to RAI B2.1.22-1, dated Sept. 15, 2011, infers that the four fire protection carbon steel tanks are included within LRA AMP B2.1.22, Internal Surface, and are correct "for internal inspection or ultrasonic inspection of tank bottoms." The four carbon steel, fire protection tanks in the LRA line items do not appear to be associated with this program. Please reply with a line out for the previous response—for what appears to be an erroneous statement—that includes tanks in this AMP.
 - b. Item 2: The applicant's response to RAI B2.1.22-1, dated Sept. 15, 2011, states that "The in-scope FP system components ... have internal environments ... or an external environment of concrete." There do not appear to be any Table 2, AMR line items exposed to a concrete environment for this LRA AMP's scope. Please reply with a line out—for what appears to be an erroneous statement—that concrete environments are within this AMP's scope.
 - c. Discussion (both items): The applicant explained that the statements are correct as given in the documentation, and that therefore, neither the RAI nor any changes should be needed. Staff agreed with the explanation and response and will drop plans for an RAI.
2. Review of the RAI responses dated October 10 and LRA Supplement 2 dated June 16, 2011, revealed three minor issues:
 - a. For "corrective actions" the applicant does not include common cause in the write up consistent with GALL Rev. 2. However, the corrective action program should include this. Can the applicant confirm this and post procedural steps to the portal?
 - b. The applicant includes event driven inspections in the discussion for RAI B2.1.25-1 under STP response (e). The RAI response indicates that LRA Appendix A1.25, B2.1.25, and Table A4-1 item 20 would include the discussion of item (e). Staff could not find a discussion on event driven inspections in Supplement 2 (Commitment, A1.25 or B2.1.25) or the RAI response markups for B2.1.25 or Table A4-1. The response for RAI B2.1.25-1 states in item (e) that with manholes sealed event driven occurrences should not occur. It also states that event driven inspections are performed as an on-demand activity based on actual plant experience. Two options to resolve this could be (a) operating experience that shows that with manholes sealed and sump pumps installed, for

- event driven occurrences (significant rain or flood as defined by STP) water intrusion has not occurred such that cables were exposed to significant moisture; or (b) add the event driven explanation as shown in the RAI B2.1.25-1 discussion for item (e) (Table A4-1 item 20 and A1.25).
- c. While the applicant's response stated that inspection frequencies are based on plant experience, it does not indicate that test frequencies may be increased based on test results. This issue is not specifically addressed by the response but it does state that test results are to be trended. Staff needs clarification that the test methods used actually result in data that can be trended, or else the applicant could include a test frequency statement consistent with GALL Rev 2.
 - d. Discussion (all items):
 - i. Item 3a: The applicant agreed to post the information for 3a onto the portal for the staff to review.
 - ii. Item 3b: The applicant agreed that the response could be clarified by adding to A1.25, B2.1.25 and A4-1 the following. "Event-driven inspections are performed as an on-demand activity based on actual plant experience." The staff agreed that this was an acceptable resolution.
 - iii. The applicant requested that this item be included as an RAI so it could develop its response and send it to the staff. The staff indicated that this would be added to an RAI set already in preparation and sent to STP.
3. RAI Set 9 questions: Applicant requests discussion of the following RAIs from Set 9:
- a. Boric Acid Corrosion - (010) RAI 3.3.1.88-2
 - i. Issue
 - 1. The applicant's statement that the aging management evaluation for a borated water leakage environment is applicable only for components that contain borated water is not consistent with 10 CFR Part 54 or the GALL Report.
 - 2. Given that the applicant stated that it is possible that the aluminum sheathing could be exposed to borated water leakage, it is not clear to the staff why the appropriate material, environment, aging effect/program item does not appear in LRA Table 3.3.2-19. The staff noted that the LRA contains other components that do not contain treated borated water, but are exposed to a treated borated water leakage environment and are managed by the Boric Acid Corrosion Program. These include, but are not limited to, instrument supports in LRA Table 3.5.2-11 and electrical connectors in LRA Table 3.6.2-1.
 - ii. Request
 - 1. Include the aging management evaluation for the aluminum sheathing exposed to air with borated water leakage in LRA Table 3.3.2-19.
 - 2. Include the aging management evaluations for other components which may be exposed to an air with borated water leakage environment, but were not previously evaluated for that environment because they do not contain borated water.
 - iii. Discussion: The staff indicated that its position is derived from the GALL Report, and that the RAI is intended to allow the applicant to revise its

LRA to agree with the GALL Report or to provide some other justification. Staff indicated some clarification to the wording of the RAI could be beneficial and agreed to look into that.

- b. Compressed Air (025) - RAI 3.3.1.53-1
 - i. Issue: Although the alternate aging management program credited in the LRA performs periodic inspections of components, it was unclear to the staff why the preventive measures and performance monitoring aspects described in the GALL Report AMP XI.M24 are not used to manage aging of these components at the South Texas Project site. In addition, it was unclear to the staff why the aging management aspects of the applicant's response to NRC Generic Letter 88-14 are not being credited for these components.
 - ii. Request: Provide technical bases for why only condition monitoring through the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program is sufficient to manage aging of steel and stainless steel piping components exposed to internal condensation in the compressed air system without any preventive measures or performance testing aspects recommended by the GALL Report. Include a discussion of why the aging management aspects of the site's response to Generic Letter 88-14 are not being credited for these components.
 - iii. Discussion: Staff agreed to take another look at this RAI, and to clarify the request, or to withdraw it if staff concludes it is not necessary.
- c. Aboveground Tanks (030) - RAI B2.1.20-5A (Follow-up)
 - i. Issue: The staff considers that the grout that has been installed to prevent water entry between the stainless steel AFST liner and its concrete enclosure is equivalent to a sealant described in GALL AMP XI.M29. Therefore, the grout should be inspected for cracking to ensure that water is not leaking into the space between the liner and the concrete enclosure. The staff could not find any AMR items that manage this grout. LRA Section B1.20, External Surfaces Monitoring program and the appropriate AMR table should be revised to reflect the inspection of the grout as described in GALL AMP XI.M29.
 - 1. In addition, given the function of the grout, the UFSAR Supplement should be revised to reflect crediting the grout and its inspection to ensure that these aspects are reflected in the CLB during the period of extended operation.
 - ii. Request: Explain why periodic inspections of the grout are not needed to ensure that the grout is not degrading, or propose an AMP to manage the aging of the grout.
 - iii. Discussion: The staff and applicant discussed the actual arrangement of pipe entry points and surrounding concrete. The applicant stated it understood the staff's RAI. The applicant stated it will re-inspect the tank to determine if the concrete extends completely up to the piping, or if grout is used to seal an area between the two materials.
- 4. Dec. 1, 2011 call on RAI B2.1.7-3, bolting integrity.
 - a. Issue: It is unclear to the staff how a non-corrosive environment is achieved locally for each in-scope high strength structural bolt. It is also unclear to the

staff how visual inspection of the exterior surface of the bolting is adequate to detect SCC in the threaded portions of the bolted connections.

- b. Request: Provide additional information to demonstrate that all in-scope high-strength structural bolts with greater than 1 inch nominal diameter have been completely removed from a localized corrosive environment and are not at risk of being exposed to a corrosive environment during the period of extended operation, or update the program to include volumetric examinations comparable to that of ASME Code Section XI, Table IWB-2500-1, Examination Category BG-1.
- c. Discussion: Staff and applicant discussed this issue; staff indicated that its position stems from the GALL Report, and that the applicant to-date has not provided any information that would demonstrate that its high-strength bolting inside containment is not in an environment conducive to corrosion – for example such bolting could be located in cubicles or semi-enclosed spaces not accessible during power operations, where humidity, steam, or condensation can exist. The staff indicated that the applicant’s definition of “plant – indoor air” includes moisture. The applicant indicated it understood the issue and would provide its response to the RAI.

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/RA/

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ADAMS Accession No.: ML11348A039

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DATE	12/14/11	12/15/11	12/16/11	1/04/12

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Memorandum to STP Nuclear Operating Company from J. Daily dated January 4, 2012

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