

December 15, 2011

Mr. Scott Head, Manager  
Regulatory Affairs  
STP Units 3 & 4  
Nuclear Innovation North America, LLC  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 414 RELATED TO  
SRP SECTION 02.03.01 FOR THE NUCLEAR INNOVATION NORTH  
AMERICA, LLC COMBINED LICENSE APPLICATION

Dear Mr. Head:

By letter dated September 20, 2007, South Texas Project (STP) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

S. Head

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If you have any questions or comments concerning this matter, I can be reached at 301-415-6590 or by e-mail at [David.Misenhimer@nrc.gov](mailto:David.Misenhimer@nrc.gov) or you may contact George Wunder at 301-415-1494 or [George.Wunder@nrc.gov](mailto:George.Wunder@nrc.gov).

Sincerely,

*/RA/*

David Misenhimer, Project Manager  
Licensing Branch 3  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-012, 52-013

eRAI Tracking No.: 6246

Enclosure:  
Request for Additional Information

cc: William Mookhoek  
James Agles  
Loree Elton

S. Head

- 2 -

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<b>DATE</b>	12/15/2011	12/15/2011	12/15/2011	12/15/2011	12/15/2011

\*Approval captured electronically in the email system.

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## **Request for Additional Information No. 6246**

**South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 02.03.01 - Regional Climatology  
Application Section: 2.0, 2.3.1, 3.3.2, 3.5.1.4, 3.5.3, 3.8**

### **QUESTIONS for Siting and Accident Conseq Branch (RSAC)**

#### **02.03.01-24**

10 CFR 52.79(a)(1)(iii) states, in part, that the COL FSAR should include the meteorological characteristics of the proposed site with appropriate consideration of the most severe of the natural phenomena that have been historically reported for the site and surrounding area and with sufficient margin for the limited accuracy, quantity, and period of time in which the historical data have been accumulated. 10 CFR 100.20(c)(2) states that the meteorological characteristics of the site that are necessary for safety analysis or that may have an impact upon plant design must be identified and characterized and 10 CFR 100.21(d) states, in part, that the meteorological characteristics of the site must be evaluated and site parameters established such that potential threats from such physical characteristics will pose no undue risk to the type of facility proposed to be located at the site.

10 CFR Part 50, Appendix A, GDC 2 requires that SSCs that are important to safety be designed to withstand the effects of natural phenomena, such as tornadoes and hurricanes, without loss of the ability to perform their safety functions. 10 CFR Part 50, Appendix A, GDC 4 requires that SSCs that are important to safety be appropriately protected against the effects of missiles that may result from events and conditions outside the nuclear power unit.

Nuclear power plants must be designed so that they remain in a safe condition under extreme meteorological events, including those that could result in the most extreme wind events (tornadoes and hurricanes) that could reasonably be predicted to occur at the site. Initially, the U.S. Atomic Energy Commission (predecessor to the NRC) considered tornadoes to be the bounding extreme wind events and issued RG 1.76, "Design-Basis Tornado for Nuclear Power Plants," in April 1974. The design-basis tornado wind speeds were chosen so that the probability that a tornado exceeding the design basis would occur was on the order of  $10^{-7}$  per year per nuclear power plant. In March 2007, the NRC issued Revision 1 of RG 1.76, "Design-Basis Tornado and Tornado Missiles for Nuclear Power Plants." Revision 1 of RG 1.76 relied on the Enhanced Fujita Scale, which was implemented by the National Weather Service in February 2007. The Enhanced Fujita Scale is a revised assessment relating tornado damage to wind speed, which resulted in a decrease in design-basis tornado wind speed criteria in Revision 1 of RG 1.76. Since design-basis tornado wind speeds were decreased as a result of the analysis performed to update RG 1.76, it was no longer clear that the revised tornado design basis wind speeds would bound design-basis hurricane wind speeds in all areas of the United States. This prompted an investigation into extreme wind gusts during hurricanes and their relation to design basis hurricane wind speeds, which resulted in issuing RG 1.221, "Design-Basis Hurricane and Hurricane Missiles for Nuclear Power Plants," in October 2011.

RG 1.221 also evaluated missile velocities associated with several types of missiles considered for different hurricane wind speeds. The hurricane missile analyses presented in RG 1.221 are

based on missile aerodynamic and initial condition assumptions that are similar to those used for the analyses of tornado-borne missile velocities adopted for Revision 1 to RG 1.76. However, the assumed hurricane wind field differs from the assumed tornado wind field in that the hurricane wind field does not change spatially during the missile's flight time but does vary with height above the ground. Because the size of the hurricane zone with the highest winds is large relative to the size of the missile trajectory, the hurricane missile is subjected to the highest wind speeds throughout its trajectory. In contrast, the tornado wind field is smaller, so the tornado missile is subject to the strongest winds only at the beginning of its flight. This results in the same missile having a higher maximum velocity in a hurricane wind field than in a tornado wind field with the same maximum (3-second gust) wind speed.

The STP COLA incorporates by reference the ABWR Design Control Document (DCD). Section 3.5.1.4 of the DCD states, in part, that "tornado-generated missiles have been determined to be the limiting natural phenomena hazard in the design of all structures required for safe shutdown of the nuclear power plant. Since tornado missiles are used in the design basis, it is not necessary to consider missiles generated from other natural phenomena." However, Section 3.5.4.2 of the DCD states, in part, that the COL applicant "shall identify missiles generated by other site-specific natural phenomena that may be more limiting than those considered in the ABWR design and shall provide protection for the structures, systems, and components against such missiles."

Accordingly, the applicant is requested to address the following:

- a. Consistent with the requirements of 10 CFR 52.79(a)(1)(iii), 10 CFR 100.20(c)(2), 10 CFR 100.21(d), and the Combined License Information requirement of ABWR DCD Section 3.5.4, please identify hurricane wind speed and missile spectra for the STP site. RG 1.221 describes a method that the staff considers acceptable in selecting site-specific hurricane wind speed and hurricane-generated missiles.
- b. Pursuant to the requirements of GDC 2, GDC 4, and the Combined License Information requirement of ABWR DCD Section 3.5.4, please confirm that the ABWR standard plant and STP site-specific SSCs important to safety are designed to protect against the combined effects of hurricane winds and missiles defined in question a above.
- c. Please revise the appropriate FSAR sections to appropriately reflect the results of questions a and b above.