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

April 19, 2012

LICENSEE: STP Nuclear Operating Company

FACILITY: South Texas Project

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 22, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND STP NUCLEAR OPERATING COMPANY, REGARDING REQUESTS FOR ADDITIONAL INFORMATION - SET 14, FOR THE SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (TAC. NOS. ME4936 AND ME4937)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held a telephone conference call on February 22, 2012, to discuss requests for additional information (RAIs) presented in RAI Set 14, for the South Texas Project, Units 1 and 2, license renewal application. The telephone conference call was useful in clarifying the staff's requests and the applicant's questions for the RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a summary of the discussion.

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 and 50-499

Enclosures:
As stated

cc w/encls: Listserv

TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
February 22, 2012

PARTICIPANTS	AFFILIATIONS
John Daily	Nuclear Regulatory Commission (NRC)
James Gavula	NRC
Bart Fu	NRC
Arden Aldridge	STP Nuclear Operating Company (STPNOC)
Ken Taplett	STPNOC
Gary Warner	STARS Center of Business – Worley Parsons
Kenneth Bryant	STARS Center of Business – Worley Parsons
Al Saunders	STARS Center of Business – Worley Parsons

ENCLOSURE 1

CONFERENCE CALL WITH STPNOC
REGARDING RAI SET 14
STP LICENSE RENEWAL APPLICATION

February 22, 2012

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held a telephone conference call on February 22, 2012, to discuss requests for additional information (RAIs) presented in RAI Set 14, for the South Texas Project, Units 1 and 2, license renewal application.

The participants indicated that the call was useful in clarifying the questions discussed.

Discussion:
The staff and the applicant discussed the following:

Open-Cycle Cooling Water System (021)
RAI B2.1.9-1a

During its review of plant-specific operating experience, the staff noted that, in Licensee Event Reports (LERs) 499/2005-004 and 499/2010-001, cracking had apparently been identified in the heat affected zones for multiple welds in the aluminum bronze piping of the essential cooling water (ECW) system. Neither LER provided a cause of the crack initiation. Based on the identification of cracking in plant-specific operating experience which has apparently occurred in the heat affected zones for multiple welds in aluminum bronze piping of the ECW system, it is unclear to the staff why cracking is not an aging effect that requires management for the associated material and environment combination.

RAI B2.1.9-2a

The staff discussed its observations that while the applicant is managing loss of material due to cavitation erosion through the Open-Cycle Cooling Water System program, it did not provide information in the response to RAI B2.1.9-2 as to which specific program elements are affected by this enhancement, and in what specific manner(s). In addition, the staff noted that the applicant appears to be using different definitions of the term erosion corrosion in its responses to RAI B2.1.9-2 and RAI 3.4.2.6-1.

RAI B2.1.9-3a

The staff discussed its observation that, although the applicant indicated that STP has not experienced sheeting-type coating failures, on multiple occasions the coating failures have resulted in material of sufficient size to block various heat exchanger tubes. While these occasions to date have not adversely affected the intended functions of downstream components, these situations appear to be related to the **amount of debris** resulting from coating breakdowns as opposed to the **inability of the debris** from coating breakdowns to affect the intended function.

RAI B2.1.9-4a

Since the applicant stated that it was acceptable for coatings to erode away between inspections, it is not clear to the staff how the lifetime of the component can be calculated because the amount of time that the coating has protected the component appears to be unknown. As a result, the staff would expect that the "conservatism" referred to in applicant's earlier response (to RAI B2.1.9-4) would assume the worst case loss of material which could occur between inspections without any coating. The staff indicated that it is not clear how the applicant defined the conservatisms used to calculate the lifetime of the component, nor how those conservatisms were established.

Heat Exchangers (085)
RAI 3.3.2.4-2

As a part of the staff's review of the applicant's response to RAI 3.3.2.4-1, the staff noted that outside air could be filtered prior to entry into the buildings; yet from a practical perspective, the air **within** the associated buildings cannot be considered a "clean air environment," since dust and debris are also generated inside the buildings during normal plant activities. If, however, the heat exchanger surfaces (like a room cooler) have air filters just prior to the heat exchanger that are periodically maintained, then the component (the heat exchanger) could be considered to be exposed to a clear air environment. Otherwise, if room air is circulated past heat exchanger surfaces without a filter that is periodically maintained, then the determination that this aging effect is not expected to occur would need to be confirmed. As noted in GALL Report AMP XI.M32, "One-Time Inspection," "situations in which additional confirmation is appropriate include (a) an aging effect is not expected to occur, but data are insufficient to rule it out with reasonable confidence, or (b) an aging effect is expected to progress very slowly in the specified environment, but the local environment may be more adverse than generally expected."

One-Time Inspection of ASME Code Class 1 Small-Bore Piping (036)
RAI B2.1.19-4

The staff noted that MRP-24 (to which the applicant referred in its response to RAI B2.1.19-3 dated January 18, 2012) was superseded in 2005 by revised guidance, "Management of Thermal Fatigue in Normally Stagnant Non-Isolable Reactor Coolant System Branch Lines (MRP-146)." The staff further noted that MRP-146 and its supplement contain many improvements, including inspection locations, in managing thermal fatigue in reactor coolant system branch lines. GALL Report, Revision 2, recommends and references the revised guidance, MRP-146.

Given the different submittals provided by the applicant regarding this program, the staff needs clarification regarding the applicant's latest proposed AMP, "One-Time Inspection of ASME Code Class 1 Small-Bore Piping program," specifically regarding whether the applicant intended to credit the previously proposed exception to GALL AMP XI.M35. The staff explained why it does not find such exception acceptable, since it does not provide any technical justification why

use of Risk Informed-Inservice Inspection is sufficient when compared to the latest recommendation in the GALL Report, Revision 2 (i.e., MRP-146).

The applicant stated that it has implemented MRP-146 and that the MRP-146 inspection locations are part of the RI-ISI program. The staff pointed out that the LRA and RAI responses only mention MRP-24, and that MRP-146 is not mentioned. The staff also noted that the LRA program states that the RI-ISI covers identical locations as MRP-24. The staff, in its RAI, is asking the applicant to resolve the apparent discrepancy.

As a result of the discussions on these RAIs, the applicant indicated it understood the staff's issues and would formulate responses to address them.

Memorandum to File from J. Daily dated April 19, 2012

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