Nuclear Operating Company

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

May 3, 2012
NOC-AE-12002848
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File: G25

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
Response to Request for Additional Information (RAI) 3.3.2.2.12.2-1 for the
South Texas Project License Renewal Application (TAC Nos. ME4936 and ME4937)

References: 1. STPNOC letter dated October 25, 2010, from G. T. Powell to NRC Document Control Desk, "License Renewal Application" (NOC-AE-10002607) (ML103010257)
2. Record of Teleconference of April 26, 2012 between STPNOC and the NRC Regarding Request for Additional Information (RAI) 3.3.2.2.12.2-1 for the South Texas Project, Units 1 and 2, License Renewal Application (TAC Nos. ME4936 and ME4937) (ML121220190)

By Reference 1, STP Nuclear Operating Company (STPNOC) submitted a License Renewal Application (LRA) for South Texas Project (STP) Units 1 and 2. By Reference 2, STPNOC received RAI 3.3.2.2.12.2-1. The response to the request for additional information is provided in Enclosure 1 to this letter. Changes to LRA pages described in Enclosure 1 are depicted in line-in/line-out pages provided in Enclosure 2.

There are no regulatory commitments in this letter.

Should you have any questions regarding this letter, please contact either Arden Aldridge, STP License Renewal Project Lead, at (361) 972-8243 or Ken Taplett, STP License Renewal Project regulatory point-of-contact, at (361) 972-8416.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5-3-2012

K. D. R

Kevin D. Richards
President & Chief Executive Officer

KJT
Enclosure: 1. STPNOC Supplemental Response to RAI 3.3.2.2.12.2-1
2. STPNOC LRA Changes with Line-in/Line-out Annotations

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Enclosure 1

STPNOC Supplemental Response to RAI 3.3.2.2.12.2-1

RAI 3.3.2.2.12.2-1

LRA Section B2.1.23 describes the existing Lubricating Oil Analysis program as consistent, with exceptions to GALL Report AMP XI.M39.

LRA Section 3.3.2.2.12.2, associated with LRA Table 3.3.1, item 3.3.1.33, addresses loss of material due to pitting, crevice, and microbiologically influenced corrosion for stainless steel piping, piping components, and piping elements exposed to lubricating oil. It further states that the reactor coolant pump lube oil collection system is managed by the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program (B2.1.22).

Issue

The staff notes that lubricating oil systems are in scope of GALL AMP XI.M39. It is not clear to the staff why the RCP lube oil collection system is in scope of the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program.

Request

Please justify the use of the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program in managing loss of material due to pitting, crevice, and microbiologically influenced corrosion for stainless steel components exposed to lubricating oil in the reactor coolant pump lube oil collection system.

STPNOC Response

LRA Section 3.3.2.2.12.2 incorrectly stated that the loss of material due to pitting, crevice, and microbiologically-influenced corrosion for stainless steel components exposed to lubricating oil in the reactor coolant pump (RCP) lube oil collection system is managed by the Inspection of Internal Surfaces in Miscellaneous Piping and Components program. Instead, management is provided by the Lubricating Oil Analysis program and the One-Time Inspection Program.

Enclosure 2 provides the line-in/line-out revision to LRA Section 3.3.2.2.12.

Enclosure 2

STPNOC LRA Changes with Line-in/Line-out Annotations

List of Revised LRA Sections

RAI	Affected LRA Section
3.3.2.2.12.2-1	3.3.2.2.12

3.3.2.2.12 Loss of Material due to Pitting, Crevice, and Microbiologically-Influenced Corrosion

3.3.2.2.12.1 Stainless steel, aluminum, and copper alloy piping and components exposed to fuel oil

The Fuel Oil Chemistry program (B2.1.14) and the One-Time Inspection program (B2.1.16) manage loss of material due to pitting, crevice and microbiologically influenced corrosion for stainless steel and copper components exposed to fuel oil. The one-time inspection will include selected components at susceptible locations where contaminants could accumulate (e.g. stagnant flow locations).

3.3.2.2.12.2 Stainless steel piping and components exposed to lubricating oil

The Lubricating Oil Analysis program (B2.1.23) and the One-Time Inspection program (B2.1.16) manage loss of material due to pitting, crevice, and microbiologically influenced corrosion for stainless steel components exposed to lubricating oil. The one-time inspection will include selected components at susceptible locations where contaminants such as water could accumulate.

~~For the RCP lube oil collection system, the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program (B2.1.22) manages loss of material due to pitting, crevice, and microbiologically influenced corrosion for stainless steel components exposed to lubricating oil.~~