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

June 14, 2012

Mr. D. W. Rencurrel
Chief Nuclear Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION – AGING MANAGEMENT, SET 21 (TAC NOS. ME4936 AND ME4937)

Dear Mr. Rencurrel:

By letter dated October 25, 2010, STP Nuclear Operating Company (STPNOC or the applicant) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew operating licenses NPF-76 and NPF-80 for South Texas Project, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Arden Aldridge, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3873 or by e-mail at john.daily@nrc.gov.

Sincerely,

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

Docket Nos. 50-498 and 50-499

Enclosure:
As stated

cc w/encl: Listserv

SOUTH TEXAS PROJECT, UNITS 1 AND 2,
REQUEST FOR ADDITIONAL INFORMATION
AGING MANAGEMENT, SET 21
(TAC NOS. ME4936 AND ME4937)

RAI 1.4-3, Future Use of Operating Experience - followup (3.05)

Background:
In request for additional information (RAI) B1.4-1, issued on May 24, 2011, the staff asked the applicant to describe the programmatic activities that will be used to continually identify aging issues, evaluate them, and as necessary, enhance aging management programs (AMPs) or develop new AMPs for license renewal. After reviewing the applicant's response dated June 23, 2011, the staff issued follow-up RAI B1.4-2, requesting specific details on the applicant's Operating Experience Program (OEP). In its response dated February 27, 2012, the applicant provided further explanation of its intent to use the Corrective Actions Program (CAP) and OEP to monitor, on an ongoing basis, industry and plant-specific operating experience regarding age-related issues. By letter dated August 18, 2011, the applicant submitted a supplement to its license renewal application (LRA) to include an updated Section A1 to its updated Final Safety Analysis Report (UFSAR) Supplement.

In March 16, 2012, the NRC issued LR-ISG-2011-05, "Ongoing Review of Operating Experience" to clarify the staff's position that license renewal AMPs should be informed, and enhanced when necessary, based on the ongoing review of both plant-specific and industry operating experience.

Issue:
The applicant provided details of its programmatic framework for considering operating experience on an ongoing basis. However, as compared to the staff's guidance in LR-ISG-2011-05, the staff identified the following areas for further clarification:

(a) It is unclear which specific "event codes" in the CAP capture age-related equipment failures or degradation. The applicant also did not provide further description or definition of each event code to relate them to how aging-issues would be identified.

(b) It is unclear what implementing action would result from the training "needs analysis" for personnel who implement, screen, assign, evaluate, and submit plant-specific and industry operating experience information. The applicant also did not provide details regarding the periodicity of training and provisions included to accommodate the turnover of plant personnel.

The applicant has also supplemented its UFSAR with a description of how operating experience is applied to manage the effects of aging so that the intended functions of structures and components are met. However, the summary description in the UFSAR is not sufficient in capturing the key areas for consideration, as compared to the guidance in Table 3.0-1 "FSAR Supplement for Aging Management of Applicable Systems" of LR-ISG-2011-05.

ENCLOSURE

Request:

1) Provide a response to the following:

   (a) Clarify which "event codes" in the CAP are used to capture age-related equipment failures or degradation. With each event code, please provide the definition and/or criteria showing how these codes are used to screen or define aging related issues.

   (b) Clarify how the results of the "needs analysis" will be evaluated and considered for personnel responsible for screening, assigning, evaluation, implementation, and submitting age-related operating experience. Also, provide the periodicity of the training and describe how it will account for personnel turnover. The explanation should provide a clear description of how this training will be implemented (i.e., in accordance with relevant and appropriate programmatic standards).

2) In LRA Appendix A, "Final Safety Analysis Report Supplement," provide a more detailed description of how operating experience will be reviewed on an ongoing basis to address operating experience concerning age-related degradation and aging management during the term of the renewed license. At a minimum, provide the level of detail that is commensurate or consistent with the guidance described in Table 3.0-1 "FSAR Supplement for Aging Management of Applicable Systems" of LR-ISG-2011-05.

Letter to D. W. Rencurrel from John W. Daily dated June 14, 2012

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/RA/

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