



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

June 4, 2012
NOC-AE-12002867
10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
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Rockville, MD 20852-2738

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Revised 60-Day Response to Request for Information Pursuant to 10 CFR 50.54(f)
Regarding Recommendation 9.3 of the Near-Term Task Force Review of
Insights from the Fukushima Dai-ichi Accident

- References:
1. Letter, Eric Leeds to E. D. Halpin, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340)
 2. Letter, D.W. Rencurrel to NRC, "60-Day Response to Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident", dated May 9, 2012

On May 9, 2012, STP Nuclear Operating Company (STPNOC) submitted our 60-day response to Reference 1 describing our alternative course of action (Reference 2). On May 31, 2012, we were notified by the Nuclear Regulatory Commission (NRC) staff that additional information was needed to make a determination regarding the adequacy of our proposed alternate course of action. Specifically, an estimated date for the first occurrence of our second refueling outage was needed. STPNOC provides our revised response described in Attachment 1 of this letter. The basis for our proposal is explained in Attachment 2. The appended information is shown by change bars in the right hand margin.

The only commitments in this letter are summarized in Attachment 3.

ADD1
HRR

STI 33556993

If there are any questions regarding this letter, please contact Robyn Savage at (361) 972-7438 or me at (361) 972-7867.

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

Executed on: 6/4/2012


D. W. Rehcurrel
Chief Nuclear Officer

- Attachments:
1. Proposed Alternative Course of Action for Responding to Recommendation 9.3 Information Request
 2. Basis for Proposed Alternative Course of Action for Responding to EP Requested Information
 3. List of Commitments

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Proposed Alternative Course of Action for
 Responding to Recommendation 9.3 Information Request

Communications

Request #	Estimated Completion Date	Requested Information
1	10/31/2012	<p>Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described in the NRC Request. The assessment should:</p> <ul style="list-style-type: none"> • Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies, • Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies, • Provide a description of any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, and • Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all AC power
2	6/11/2012	Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.
3	Two Dates 09/28/12 10/31/2012	<p>Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.</p> <p>Conduct the communications assessment.</p> <p>Provide an implementation schedule of the time needed to implement the results of the communications assessment.</p>

Proposed Alternative Course of Action for
 Responding to Recommendation 9.3 Information Request

Staffing

Request #	Estimated Completion Date	Requested Information
1	<p>Two Dates</p> <p>4/30/2013</p> <p>4 months prior to the beginning of 2RE17 (Estimated date 6/4/14)*</p>	<p>Provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described in the NRC Request. This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:</p> <ul style="list-style-type: none"> • How onsite staff will move back-up equipment (e.g., pumps, generators) from alternate onsite storage facilities to repair locations at each reactor as described in the order regarding the NTTF Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table B-1 such as plant operations and assessment of operational aspects, emergency direction and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate. • New staff or functions identified as a result of the assessment. • Collateral duties (personnel not being prevented from timely performance of their assigned functions). <p>Provide onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment]</p> <p>Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment]</p> <p>* As used within the context of NRC Order EA-12-049. This date corresponds to 4 months prior to the beginning of the currently planned first occurrence of the second refueling outage (2RE17). The 2RE16 outage counts as the first refueling outage based on submitting the overall integrated plan on February 28, 2013. 1RE19 outage will be the second refueling outage in the second Unit.</p>

Proposed Alternative Course of Action for
 Responding to Recommendation 9.3 Information Request

Request #	Estimated Completion Date	Requested Information
2	Four dates 3/29/2013	Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes. 1. Conduct the onsite and augmented staffing assessment: The onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment]
	5 months prior to the beginning of 2RE17* <i>(Estimated date 5/4/14)*</i> 4/30/2013	The onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment] 2. A schedule of the time needed to implement changes will be provided as follows: Those associated with the Phase 1 staffing assessment.
	4 months prior to the beginning of 2RE17* <i>(Estimated date 6/4/14)*</i>	Those associated with the Phase 2 staffing assessment. <i>* As used within the context of NRC Order EA-12-049. This date corresponds to 4 months prior to the beginning of the currently planned first occurrence of the second refueling outage (2RE17). The 2RE16 outage counts as the first refueling outage based on submitting the overall integrated plan on February 28, 2013. 1RE19 outage will be the second refueling outage in the second Unit.</i>
3	6/11/2012	Identify how the augmented staff would be notified given degraded communications capabilities.

Proposed Alternative Course of Action for
 Responding to Recommendation 9.3 Information Request

Request #	Estimated Completion Date	Requested Information
4	6/11/2012	Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.
5	6/11/2012	Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.
6	<p>Two Dates</p> <p>4/30/2013</p> <p>4 months prior to the beginning of 2RE17* (Estimated date 6/4/14)*</p>	<p>Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.).</p> <p>Changes will be identified as follows:</p> <p>Those associated with the Phase 1 staffing assessment.</p> <p>Those associated with the Phase 2 staffing assessment.</p> <p>* As used within the context of NRC Order EA-12-049. This date corresponds to 4 months prior to the beginning of the currently planned first occurrence of the second refueling outage (2RE17). The 2RE16 outage counts as the first refueling outage based on submitting the overall integrated plan on February 28, 2013. 1RE19 outage will be the second refueling outage in the second Unit.</p>

**Basis for Proposed Alternative Course of Action for
 Responding to EP Requested Information**

Communications

There are two separate responses to the information requests related to communications. The alternative timing of responses to requests #1 and #3 proposed in this letter reflects the higher priority placed by the staff, and approved by the Commission in SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (76 Fed. Reg. 72,560). The proposed alternative timing is warranted as many of the licensee staff resources necessary for performing the communications assessment are the same resources involved in implementing the new EP Rule requirements, responding to Institute of Nuclear Power Operations (INPO) initiatives related to enhancing communications capabilities (e.g., IER 11-4), and maintaining existing EP communications equipment.

In addition, the estimated completion date assigned to information request #3 will promote alignment between the out-year budgeting/funding of future enhancements, and the development of an accurate and complete enhancement implementation schedule.

Staffing

As presented in Attachment 1 of this letter, a 2-phase approach will be used to respond to the information requests associated with Staffing. The table below summarizes this approach.

Plant Type	Phase 1 Staffing Assessment (for functions except those related to NTTF Recommendation 4.2)	Phase 2 Staffing Assessment (for functions related to NTTF Recommendation 4.2)
Multi-unit plant	<ul style="list-style-type: none"> • Perform staffing assessment and implement actions as required by recent EP Rule using ISG and NEI 10-05 • Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01 and material from NEI 10-05; provide results per Attachment 1 of this letter 	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per Attachment 1 of this letter

The basis for this approach is discussed below.

- The Phase 1 staffing assessment will be performed by March 29, 2013, and provided by April 30, 2013. This assessment will consider all requested functions except those related to Fukushima Near-Term Task Force (NTTF) Recommendation 4.2. An assessment considering these functions will be performed in Phase 2.

Basis for Proposed Alternative Course of Action for Responding to EP Requested Information

The timing of the Phase 1 staffing assessment reflects the higher priority placed by the staff, and approved by the Commission is SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (76 Fed. Reg. 72,560). In particular, Section IV.A.9 of 10 CFR 50, Appendix E, requires that licensees complete a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan. As stated in the EP Rule, this analysis must be completed by December 24, 2012.

Following completion of EP Rule staffing analysis, the staffing assessment associated with the NRC Letter will be performed. Based on staffing analysis experience to date, it is anticipated that a multi-unit staffing analysis will require approximately 3 months to complete and validate. One additional month is allotted for processing of an assessment submittal package.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 1 staffing assessment.

- The Phase 2 staffing assessment will be performed approximately 5 months prior to the beginning of 2RE17 and provided 4 months prior to the beginning of 2RE17 (*start of 2RE17 is scheduled for 10/4/14*). This assessment will consider the requested functions related to Fukushima Near-Term Task Force (NTTF) Recommendation 4.2.

The Industry will be responding to multiple regulatory actions resulting from the recommendations contained in the Fukushima NTTF Report, as modified in related Commission Papers (SECY's) and Staff Requirements Memoranda (SRM). One of these actions, in particular, has the potential to impact emergency response staffing levels. This action is associated with Fukushima NTTF Recommendation 4.2 and subsequently issued as NRC Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events EA-12-049 [the Order]. A summary of the Order is provided below.

The Order requires a three-phase approach for mitigating beyond-design-basis external events. The initial phase requires the use of installed equipment and resources to maintain or restore core cooling, containment and spent fuel pool (SFP) cooling. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be accomplished with resources brought from off site. The final phase requires obtaining sufficient offsite resources to sustain those functions indefinitely.

Additional details on an acceptable approach for complying with the Order will be contained in final Interim Staff Guidance (ISG) scheduled to be issued by the NRC in August 2012.

In response to the Order, each licensee must develop new strategies for mitigating beyond-design-basis external events. To ensure accurate results, the staffing assessment for response

**Basis for Proposed Alternative Course of Action for
Responding to EP Requested Information**

functions related to NTTF Recommendation 4.2 must be based on the actions delineated in procedures and guidelines developed in response to the Order. Once the site-specific actions associated with the new response strategies are defined (e.g., down to the procedure or guideline step level), the staffing needed to perform these actions can be assessed with the necessary level of accuracy.

Based on a review of the planned actions necessary to comply with the Order, an assessment of the staffing for the functions related to NTTF Recommendation 4.2 will be provided 4 months prior to the first occurrence of a second refueling outage at the site (i.e., the first "second refueling outage") as used within the context of NRC Order EA-12-049.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 2 staffing assessment.

The Phase 2 staffing assessment is one component of an overall licensee work plan necessary to implement the requirements of the Order. STP Nuclear Operating Company, as stated in the Order, "...shall complete full implementation no later than two (2) refueling cycles after submittal of the overall integrated plan, as required in Condition C.1.a, or December 31, 2016, whichever comes first." "Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies."

List of Commitments

The following table identifies those actions committed to by the STP Nuclear Operating Company (STPNOC) in this document. Any statements in this submittal with the exception of those in the table below are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Robyn Savage at (361) 972-7438.

Commitment	Scheduled Due Date	Condition Report
1. STPNOC will perform an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event. The assessment will be provided to the NRC.	10/31/12	12-11657-7
2. STPNOC will provide an implementation schedule of the time needed to implement the results of the communications assessment.	10/31/12	12-11657-8
3. STPNOC will perform an initial staffing assessment using NEI 12-01 and material from NEI 10-05. (Phase 1 Assessment). STPNOC will provide the NRC with the results of the Phase 1 assessment and an implementation schedule of the time needed to implement any changes.	4/30/13	12-11657-9
4. STPNOC will perform a second staffing assessment as requested by the 50.54(f) letter using NEI 12-01 and provide the results of the assessment to the NRC. (Phase 2 Assessment). STPNOC will provide the NRC with the results of the Phase 2 assessment and an implementation schedule of the time needed to implement any changes.	4 months prior to the beginning of 2RE17 (estimated date 6/4/14)	12-11657-10
5. STPNOC will identify changes associated with the Phase 1 staffing assessment that have been made or will be made to our emergency plan regarding the on-shift or augmented staffing changes including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.) and provide this to the NRC.	4/30/13	12-11657-11
6. STPNOC will identify changes associated with the Phase 2 staffing assessment that have been made or will be made to our emergency plan regarding the on-shift or augmented staffing changes including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.) and provide this to the NRC.	4 months prior to the beginning of 2RE17 (estimated date 6/4/14)	12-11657-12