



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

October 24, 2012
NOC-AE-12002909
10 CFR 50.4
10 CFR 2.202

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1&2
Docket Nos. STN 50-498, STN 50-499
Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with
Regard to Requirements for Mitigation Strategies for Beyond-Design-
Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to STP Nuclear Operating Company (STPNOC). Reference 1 was immediately effective and directs STPNOC to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was dated August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms STPNOC has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

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Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestones schedule through completion of installation and testing:

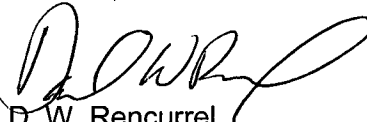
- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for STP Unit 1 prior to startup from Refueling Outage (1RE19) planned for October 28, 2015.
- Implementation of the order will be completed for STP Unit 2 prior to startup from Refueling Outage (2RE17) planned November 1, 2014.

This letter contains no new regulatory commitments.

If there are any questions regarding this letter, please contact Jim Morris at (361) 972-8652 or me at (361) 972-7867.

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

Executed on: 10-24-12


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cc:
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