



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

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Submittal of Operations Quality Assurance Plan Change QA-077

Reference: STPNOC letter dated August 1, 2012 from K. D. Richards to NRC Document Control Desk, "Submittal of Operations Quality Assurance Plan Change QA-075" (NOC-AE-12002887) ML12222A013

The STP Nuclear Operating Company (STPNOC) submits the attached change to revision 20 of the Operations Quality Assurance Plan (OQAP). This change revises previously submitted requirements related to the Independent Spent Fuel Storage Installation and Dry Cask Storage System activities (Reference). Specifically, this change removes the requirement to impose the provisions of 10CFR21 to Important to Safety (ITS) Category B structures, components, and systems. STPNOC has determined that the provisions of 10CFR21 should not be imposed on ITS Category B structures, components, and systems based on additional review of the definition of ITS Category B structure, components, and systems as stated in NUREG/CR-6407 and the definition of Basic Component in 10CFR21.3(3).

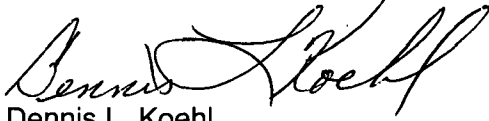
The definition in NUREG/CR-6407 for ITS Category B structure, components, and systems indicates "...The failure of a Category B item, in conjunction with the failure of an additional item, could result in an unsafe condition." Compared to the verbiage in 10CFR21.3(3), "...a defect or failure to comply with any applicable regulation in this chapter, order, or license issued by the Commission could create a substantial safety hazard", STPNOC does not interpret an ITS Category B item defect or failure as one that would "create a substantial safety hazard".

This change removes the previous requirement to apply 10CFR21 to ITS Category B structures, components, and systems. STPNOC requests Commission approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(4). STPNOC requests a response within 60 days of this correspondence.

Q004
NRC

There are no commitments in this letter.

If there are any questions regarding this matter, please contact Mr. T. F. Walker at (361) 972-7392 or me at (361) 972-7800.

A handwritten signature in black ink, appearing to read "Dennis L. Koehl". The signature is fluid and cursive, with the first name "Dennis" and last name "Koehl" clearly distinguishable.

Dennis L. Koehl
President and CEO

Attachment: Operations Quality Assurance Plan change QA-077

cc:
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SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION

OPERATIONS QUALITY ASSURANCE PLAN

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1.0 PURPOSE

- 1.1 The purpose of this chapter is to supplement the basic policies established and documented as stated in the previously approved 10CFR50, Appendix B Operations Quality Assurance Plan (OQAP) to include specific requirements applicable to the design, construction, and operation of the Independent Spent Fuel Storage Installation (ISFSI) and Dry Cask Storage System (DCSS) at the South Texas Project (STP).
- 1.2 The objective of this chapter is to maintain administrative control over activities relative to the important to safety structures, systems, equipment, and components regulated by 10 CFR Part 72.

2.0 SCOPE

- 2.1 The policies and procedures identified within this chapter regarding the ISFSI will form the basis for plant-life operation of the STP ISFSI. The responsibility and authority for the establishment and execution of the ISFSI Quality Plan for the operation of the STP ISFSI will be retained by STP Nuclear Operating Company (STPNOC) and described in the OQAP.
- 2.2 This program is designed to meet the requirements of 10 CFR Part 20, Appendix G for a quality assurance program for the classification and characterization of radioactive waste under 10 CFR Parts 61.55 and 61.56.

3.0 DEFINITIONS

- 3.1 Important to Safety (ITS) Structures, Systems, and Components (SSCs) - those features of the ISFSI whose functions are:
 - 3.1.1 to maintain the conditions required to store spent fuel safely;
 - 3.1.2 to prevent damage to the spent fuel container during handling and storage; and

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3.1.3 to provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

3.2 Dry Cask Storage Quality Categories - Regulatory Guide 7.10 presents a method of classification of various components in transportation packaging (10CFR71) and dry cask storage systems (10CFR72). Each component is first identified as either Important to Safety (ITS) or Not Important to Safety" (NITS). Then, components that are considered ITS are further categorized into one of three classification categories (A, B, or C), depending on that component's importance to safety.

3.3 Category A, Category B, and Category C - as described below:

Classification Category	Importance to Safety	Description
A	Critical to Safe Operation	Category A items include structures, components, and systems whose failure could directly result in a condition adversely affecting public health and safety. The failure of a single item could cause loss of primary containment leading to release of radioactive material, loss of shielding, or unsafe geometry compromising criticality control.
B	Major Impact on Safety	Category B items include structures, components, and systems whose failure or malfunction could indirectly result in a condition adversely affecting public health and safety. The failure of a Category B item, in conjunction with the failure of an additional item, could result in an unsafe condition.
C	Minor Impact on Safety	Category C items include structures, components, and systems whose failure or malfunction would not significantly reduce the packaging effectiveness and would not be likely to create a situation adversely affecting public health and safety.

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3.4 Basic, or Fundamental, Safety Criteria - the following are considered to be the basic nuclear safety criteria for design of the ISFSI (NUREG-1567):

3.4.1 Maintain sub-criticality,

3.4.2 Prevent release of radioactive material above acceptable amounts,

3.4.3 Ensure radiation rates and doses do not exceed acceptable levels,

3.4.4 Maintain retrievability of the stored radioactive materials.

3.5 Certificate of Compliance (C of C) - the certificate issued by the Commission that approves the design of a spent fuel storage cask in accordance with the provisions of 10CFR72, Subpart L.

4.0 REFERENCES

4.1 10CFR72, Licensing Requirements For The Independent Storage of Spent Nuclear Fuel And High-Level Radioactive Waste, and Reactor Related Greater Than Class C Waste - Subpart G, Quality Assurance.

4.2 ASME B&PV Code, Sections III, V, and IX (as required by DCSS Certificate of Compliance/FSAR)

4.3 Regulatory Guide 7.10, Establishing Quality Assurance Programs for Packaging used in Transport of Radioactive Material

4.4 10CFR50.55a, Codes and Standards

4.5 10 CFR Part 20, Appendix G.

4.6 10CFR 72.48, Changes, Tests and Experiments

4.7 SNT-TC-1A, American Society for Nondestructive Testing; Recommended Practice

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- 4.8 ANSI/ASNT CP-189, ANST Standard for Qualification and Certification of Nondestructive Testing Personnel
- 4.9 NUREG/CR-6407, Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety
- 4.10 NOC-AE-12002873, Independent Spent Fuel Storage Installation (STI # 33563580)
- 4.11 NUREG 1567, Standard Review Plan for Spent Fuel Dry Storage Facilities

5.0 REQUIREMENTS

- 5.1 DCSS/ISFSI Organization
 - 5.1.1 The responsibility for implementing quality program requirements for activities associated with the ISFSI and DCSS is described in the OQAP Chapter 1.0, Organization.
- 5.2 DCSS/ISFSI Quality Program
 - 5.2.1 The requirements described in the OQAP Chapter 2.0, Program Description apply to all DCSS and ISFSI construction and operation activity and as specified below.
 - 5.2.2 The determination of the ISFSI and dry storage and transport systems, structures, and components important to safety is in accordance with 10CFR71 Subpart H and 10CFR72 Subpart G, and includes those:
 - 5.2.2.1 Which comprise or are necessary to maintain the conditions required to store spent fuel or high-level radioactive waste safely,

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- 5.2.2.2 Which are necessary to prevent damage to the spent fuel or the high-level radioactive waste container during handling, storage, or transport, or
- 5.2.2.3 Which comprise or are necessary to provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.
- 5.2.3 Quality assurance requirements apply to design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, modification of structures, systems, and components, and decommissioning activities that are important to safety as defined by the DCSS Certificate of Compliance (C of C) and the DCSS Final Safety Analysis Report (FSAR).
- 5.2.4 The OQAP will provide the required control over activities affecting the quality of the identified structures, systems, and components to an extent commensurate with the importance to safety and, as necessary, to ensure conformance with the approved design of the ISFSI and DCSS.
- 5.2.5 STP will ensure that activities affecting quality are accomplished under suitably controlled conditions which include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, and assurance that pre-requisites for a given activity have been satisfied.
- 5.2.6 The need for special controls, processes, test equipment, tools and skills will be evaluated and resources will be provided to attain the required quality and the need for verification of quality by inspection and test.

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5.2.7 The degree of application of requirements and procedures will be based on the following considerations concerning the complexity and proposed use of the structures, systems, or components.

5.2.7.1 The impact of malfunction or failure of the item on safety;

5.2.7.2 The design and fabrication complexity or uniqueness of the item;

5.2.7.3 The need for special controls and surveillance over processes and equipment;

5.2.7.4 The degree to which functional compliance can be demonstrated by inspection or test; and

5.2.7.5 The quality history and degree of standardization of the item.

5.2.8 Category A items are those items that are critical to safe operation and include structures, components, and systems whose failure could directly result in a condition adversely affecting public health and safety. The failure of a single item could cause loss of primary containment leading to release of radioactive material, loss of shielding, or unsafe geometry compromising criticality control.

5.2.9 Category B items have a major impact on safety and include structures, components, and systems whose failure or malfunction could indirectly result in a condition adversely affecting public health and safety. The failure of a Category B item, in conjunction with the failure of an additional item, could result in an unsafe condition.

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5.2.10 Category C items have a minor impact on safety and include structures, components, and systems whose failure or malfunction would not significantly reduce the packaging effectiveness and would not be likely to create a situation adversely affecting public health and safety.

5.3 Design Control

5.3.1 Design Control activities are performed in accordance with OQAP Chapter 6.0, Design and Modification Control and as specified below.

5.3.2 STP will control DCSS and ISFSI design bases documents received from vendors and developed internally.

5.3.3 Design changes, tests and experiments must be reviewed pursuant to the requirements 10CFR72.48. The C of C holder may initiate 10CFR72.48 activities independent of station activities.

5.3.4 Design basis documents applicable to the ISFSI and DCSS will be included in the STP document control system, Master Equipment Database (MED), and Master Parts List (MPL) as applicable.

5.4 Procurement Document Control

5.4.1 Procurement Control activities are performed in accordance with OQAP Chapter 7.0, Procurement and as specified below.

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- 5.4.2 Procurement Document Control applies to documents employed to procure important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP relating to the ISFSI and DCSS. STPNOC controls procurement documents by written procedures that establish requirements and assign responsibility for measures to ensure that applicable regulatory requirements, design bases, and other requirements necessary to ensure quality are included in or invoked by reference in documents employed for the procurement of important to safety materials, parts, components, and services.

- 5.4.3 Procurement of SSCs applicable to the ISFSI and DCSS will meet requirements of 10CFR72 Subpart G. The graded approach to quality will be used in the quality classification of SSCs for use on the dry cask storage systems.

- 5.4.4 Originating and reviewing organizations shall require that the following be included or invoked by reference in procurement documents for important to safety items or services, as appropriate:
 - 5.4.4.1 The supplier shall provide a description of a 10CFR72, Subpart G quality assurance program, or;

 - 5.4.4.2 A 10CFR50, Appendix B or a 10CFR71, Subpart H quality assurance program that meets 10CFR72, Subpart G requirements and the recordkeeping requirements of 10CFR72.174.

 - 5.4.4.3 10CFR21 is applicable to Category A.

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5.4.5 Vendors supplying important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP will be evaluated for inclusion on the Approved Vendor List as required by OQAP Chapter 7.0, Procurement.

5.4.6 Vendors supplying important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP will be evaluated by Quality on an annual basis.

5.4.7 Vendors supplying important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP will be audited on a triennial basis.

5.5 Instructions, Procedures, and Drawings

5.5.1 Document control activities are performed in accordance with OQAP Chapter 8.0, Control and Issuance of Documents and as specified below.

5.5.2 Where the OQAP addresses control of Safety Related documents, Important to Safety Category A & B documents are to be included.

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5.5.3 These requirements are applicable to documents, which control activities Important to Safety for design, licensing, construction, operation, testing, maintenance, and modification of the ISFSI and DCSS. These documents include, but are not limited to, instructions, procedures, specifications, drawings, vendor manuals, status registers (such as drawing lists, equipment list), procurement documents, design documents, design change requests, as-built documents, non-conformance and deficiency reports, and Certificate Holder’s Final Safety Analysis Report.

5.6 Control of Purchased Materials, Equipment, and Services

5.6.1 Purchased Materials, Equipment and Service control activities are performed in accordance with OQAP Chapter 7.0, Procurement. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.7 Identification and Control of Materials, Parts and Components

5.7.1 Material, Part and Component control activities are performed in accordance with OQAP Chapter 9.0, Control of Material. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.8 Control of Special Processes

5.8.1 Special Processes are controlled in accordance with OQAP Chapter 5.0, Maintenance, Installation of Modifications, and Related Activities, Section 5.5. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.8.2 Nondestructive examinations associated with DCS activities will be evaluated by Engineering Department personnel independent of the activity. When ASME Section V is referenced personnel will be qualified in accordance with SNT-TC-1A and ANSI/ASNT CP-189.

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5.9 Inspection

- 5.9.1 Inspection is controlled in accordance with OQAP Chapter 10.0, Inspection. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.
- 5.9.2 Inspections related to DCSS/ISFSI activities shall be in accordance with the DCSS C of C and 10CFR72, Subpart G requirements.
- 5.9.3 NDE performed on DCSS shall be in compliance with referenced ASME Boiler & Pressure Vessel Code, Sections III and Section V, Articles 6, 9 and 10 or as specified in the applicable C of C and FSAR.

5.10 Inspection, Test and Operating Status

- 5.10.1 Inspection, Test and Operating Status is controlled in accordance with OQAP Chapters 3.0, Conduct of Operations, 5.0, Maintenance, Installation of Modifications, and Related Activities, 10.0, Inspection, and 11.0, Test Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.
- 5.10.2 Measures shall be established to ensure that necessary inspections of items meet the requirements and acceptance limits contained in the DCSS (C of C/FSAR) and have not been inadvertently bypassed or that SSC are not inadvertently operated outside of specified requirements.
- 5.10.3 Personnel performing examinations and tests shall be qualified as required by OQAP, Chapter 4.0 Qualification, Training and Certification of personnel.
- 5.10.4 The 10CFR72 C of C, for the storage systems in use at the STP ISFSI establishes technical specifications that ensure the systems are loaded, transferred, and maintained functional for safe storage.

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5.10.5 Sequence Change Control - Procedures will include the control of the sequence of required tests, inspections, and other operations when important to safety. To change these controls, the individual procedure must be changed, which requires the same review and approval cycle as that which authorized the original procedure.

5.11 Test Control

5.11.1 Tests are controlled in accordance with OQAP Chapter 11.0, Test Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.11.2 Provisions will be established for the performance of DCS and ISFSI surveillance testing to ensure that the necessary quality of systems and components is maintained, that facility operations are within the safety limits, and that limiting conditions of operation can be met.

5.11.3 The testing frequency will be at least as frequent as prescribed in the Technical Specifications for the 10CFR72 C of C for DCSS used at the STPEGS.

5.12 Control of Measuring and Test Equipment

5.12.1 M&TE is controlled in accordance with OQAP Chapter 12.0, Instrument and Calibration Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.13 Handling, Storage, and Shipping

5.13.1 Handling, Storage, and Shipping is controlled in accordance with OQAP Chapter 9.0, Control of Material. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.13.2 Measures will be established to control the handling of licensed radioactive materials in accordance with 10CFR72.

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5.13.3 This program includes the storage of spent fuel, high level radioactive waste, and reactor-related Greater than Class C waste. When this material is stored in the facility licensed under 10CFR50, the OQAP applies. When this material is stored in the portion of the facility licensed under 10CFR72 (the ISFSI), 10CFR72, Subpart G quality assurance requirements apply.

5.14 Records

5.14.1 Record control is in accordance with OQAP Chapter 14.0, Records Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.14.2 Records include, but are not limited to, those pertaining to the design, fabrication, erection, testing, maintenance, and use of structures, systems, and components important to safety and are required to be maintained by or under the control of the licensee or certificate holder until the NRC terminates the license or C of C as required by 10CFR72.174.

5.14.3 The term lifetime record is applicable to both the 10CFR50 and 10CFR72 licensed facilities at the STPEGS. In the case where lifetime records are applicable to both license types, the record will be maintained until the termination of the last license.

5.14.4 Records of the following activities performed in support of or as required for the ISFSI and/or DCSS shall be retained for the duration of the 10CFR72 licensed facility.

5.14.4.1 Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

5.14.4.2 Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

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- 5.14.4.3 Records of facility radiation and contamination surveys.
- 5.14.4.4 Records of radiation exposure for all individuals for whom monitoring was required.
- 5.14.4.5 Records of gaseous and liquid radioactive material released to the environment.
- 5.14.4.6 Records of training and qualification for members of the plant staff.
- 5.14.4.7 Records of in-service inspections performed pursuant to the Technical Specifications.
- 5.14.4.8 Records of Quality Assurance activities required by the OQAP.
- 5.14.4.9 Records of reviews performed for changes made to procedures or equipment or reviews for tests and experiments pursuant to 10CFR72.48.
- 5.14.4.10 Records of reviews performed pursuant to 10CFR72.212.
- 5.14.4.11 Records of meetings of the PORC.
- 5.14.4.12 Records of results of analyses required by the radiological environmental monitoring program.
- 5.14.4.13 Records of reviews performed for changes made to the Offsite Dose Assessment Manual and the Process Control Program.
- 5.14.4.14 Licensed radioactive waste disposal records.

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5.15 Nonconforming Items

5.15.1 Control of conditions adverse to quality is covered in OQAP Chapter 13.0, Control of Conditions Adverse to Quality. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.15.2 The Certificate Holder shall address any fabrication nonconformances identified that require NRC approval.

5.16 Corrective Action

5.16.1 Corrective Action is covered throughout the OQAP, in Chapter 13.0, Control of Conditions Adverse to Quality and others. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.17 Audits

5.17.1 Audits are covered in OQAP Chapter 15.0, Quality Oversight Activities and as specified below.

5.17.2 Audits of DCSS/ISFSI important to safety functions will be performed on a nominal biennial frequency to ensure the requirements of the 10CFR72 licensed ISFSI operation provisions contained within the DCSS Certificate of Compliance for the storage system(s) in use and applicable license conditions are maintained.

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6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this procedure shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with this Chapter 20.0, Dry Cask Storage System and Independent Spent Fuel Storage Installation, Section 5.14 and Chapter 14.0, Records Control.

7.0 ATTACHMENTS

7.1 None