



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

December 6, 2012
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Partial Response to Requests for Additional Information for the
Review of the South Texas Project, Units 1 and 2,
License Renewal Application – Set 25 (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. NRC letter dated November 19, 2012, "Requests for Additional Information for the Review of the South Texas Project, Units 1 and 2, License Renewal Application – Set 25 (TAC Nos. ME4936 and ME4937)" (ST-AE-NOC-12002366) (ML12311A438)

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, the NRC staff requested additional information for review of the STP LRA. STPNOC's response to the RAI A1-2, "Follow-up on Operating Experience Implementation" is provided in Enclosure 1 to this letter. A response to the remaining requests for additional information in Reference 2 will be provided at a later date.

Enclosure 2 to this letter contains one revised regulatory commitment to Table A4-1 of the LRA in a line-in/line-out format. There are no other 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.

A147
NRR

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

Executed on 12/6/2012
Date


D. W. Rencurrel
Senior Vice President

KJT

Enclosures: 1. STPNOC Response to Requests for Additional Information
2. Regulatory Commitments

Enclosure 1

STPNOC Response to Requests for Additional Information

SOUTH TEXAS PROJECT, UNITS 1 AND 2
REQUEST FOR ADDITIONAL INFORMATION, SET 25
(TAC NOS. ME4936 AND ME4937)

RAI A1-2

Follow-up on Operating Experience Implementation (3.0.5)

Background

By letter dated June 14, 2012, STP Nuclear Operating Company (STPNOC or the applicant) revised license renewal application (LRA) Section A1, which is part of the updated final safety analysis report (UFSAR) supplement, to 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 terms of the renewed licenses. This summary description identifies several enhancements that will be made to the existing Operating Experience Program and the Corrective Action Program.

Issue

LRA Section A4 describes the license renewal commitments and is also part of the UFSAR supplement. Commitment No. 41, as revised by letter dated June 14, 2012, addresses the enhancements that will be made to the Operating Experience Program and the Corrective Action Program and states that they will be implemented by December 31, 2014. LRA Section A1 describes the same enhancements but does not state an explicit implementation schedule. Therefore, the staff is unclear with respect to the applicant's intended implementation schedule.

In addition, the staff's position, as described in Final License Renewal Interim Staff Guidance, LR-ISG-2011-05, "Ongoing Review of Operating Experience," is that any enhancements to the existing operating experience review activities should be put in place no later than the date the renewed operating licenses are issued and implemented on an ongoing basis throughout the terms of the renewed licenses. The December 31, 2014, implementation schedule could be after issuance of the renewed operating licenses. As such, it is not clear how operating experience on age-related degradation and aging management will be considered during the terms of the renewed operating licenses prior to full implementation of the enhancements.

Request

Clarify the UFSAR supplement regarding the implementation schedule for the enhancements that will be made to the Operating Experience Program and the Corrective Action Program. If implementation will be after issuance of the renewed operating licenses, provide a justification and include any relevant practical considerations that would impact the implementation timeframe.

STPNOC Response:

Commitment No. 41 is revised to indicate that enhancements will be made to the Operating Experience Program and the Corrective Action Program as described in revised Section A1 of the License Renewal Application (Reference: ML12174A340, dated June 14, 2012) no later than the date the renewed operating licenses are issued.

Enclosure 2 provides the line-in/line-out revision to Item 41 to Table A4-1 of the LRA.

Enclosure 2
Regulatory Commitments

A4 LICENSE RENEWAL COMMITMENTS

Table A4-1 identifies proposed actions committed to by STPNOC for STP Units 1 and 2 in its License Renewal Application. These and other actions are proposed regulatory commitments. This list will be revised, as necessary, in subsequent amendments to reflect changes resulting from NRC questions and STPNOC responses. STPNOC will utilize the STP commitment tracking system to track regulatory commitments. The Condition Report (CR) number in the Implementation Schedule column of the table is for STPNOC tracking purposes and is not part of the amended LRA.

Table A4-1 License Renewal Commitments

Item #	Commitment	LRA Section	Implementation Schedule
41	<p>Enhance the STP Operating Experience Program and Corrective Action Program for managing the effects of aging to:</p> <ul style="list-style-type: none"> • Add License Renewal Interim Staff Guidance and revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report", to the Operating Experience Program (OEP) procedure as sources of information within the scope of this program, • Revise the OEP procedure to include "aging effects" to the list of characteristics for determining applicability of an OE document that may require further evaluation. A screened-in evaluation should consider (a) systems, structures, or components, (b) materials, (c) environments, (d) aging effects, (e) aging mechanisms, and (f) aging management programs, • Review the Corrective Action Program Event Codes to determine if additional codes are needed to ensure age-related degradation effects are identified, • Perform a training "needs analysis" for those plant personnel, including aging management program owners, who screen, assign, evaluate, implement, and submit plant-specific and industry operating experience information for age-related effects. Include in the analysis: <ul style="list-style-type: none"> ○ A requirement that individuals complete training before performing tasks, and ○ A determination of the periodicity of the training. • Revise the OEP procedure to provide criteria for reporting plant-specific operating experience of age-related degradation. 	A1	<p>December 31, 2014</p> <p><u>No later than the date the renewed operating licenses are issued.</u></p> <p>CR 12-8990</p>