



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

June 4, 2012  
NOC-AE-12002858  
STI No. 33552943  
File No.: G25  
10CFR50

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
GSI 191 Resolution Path Schedule and Commitment Changes

- Reference:
1. NEI letter dated May 4, 2012 from John C. Butler to Mr. William H. Ruland, "GSI-191 Current Status and Recommended Actions for Closure" (ST-AE-NOC-12002309, ML 121080006).
  2. STP Nuclear Operating Company letter dated December 14, 2011 to NRC Document Control Desk, "Status of the South Texas Project Risk-Informed (RI) Approach to resolve Generic Safety Issue (GSI) 191" (ST-AE-NOC-11002779, ML 11354A386).
  3. NRC Letter dated October 13, 2010 from Balwant Singal, Project Manager, to STP Nuclear Operating Company, "SUMMARY OF SEPTEMBER 13, 2010, CATEGORY 1 MEETING, VIA CONFERENCE CALL, WITH STP NUCLEAR OPERATING COMPANY-DISCUSSION OF DRAFT RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION FOR GENERIC LETTER 2004-02, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY RECIRCULATION DURING DESIGN BASIS ACCIDENTS AT PRESSURIZED-WATER REACTORS" (TAC NOS. MC4719 AND MC4720)," (ST-NOC-AE-10002034, ML 102810345).
  4. STP Nuclear Operating Company letter dated June 26, 2008 to NRC Document Control Desk, "Response to NRC Request for Information Regarding STPNOC Request to Extend Implementation Date for ECCS Sump Design Basis (TAC Nos. MC4719 and MC4720)" (NOC-AE-08002328, ML 081890190).
  5. STP Nuclear Operating Company letter dated December 11, 2008 to NRC Document Control Desk, "Supplement 4 to the Response to Generic Letter 2004-02" (NOC-AE-08002372, ML 085520336).

Pursuant to Reference 1, STP Nuclear Operating Company (STPNOC) is notifying the NRC that STPNOC is committed to resolve GSI 191, site specifically, through a risk informed approach.

A001  
NRC

Received on  
1/23/12

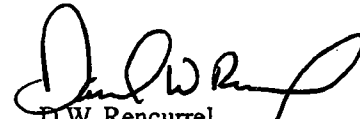
STPNOC now plans to make a docketed License Amendment Request (LAR) submittal not later than 28 March, 2013. This commitment is listed in the attachment. As previously communicated in Reference 2:

“In the risk-informed approach, STPNOC intends to seek exemption from certain requirements of 10 CFR 50.46 based on a determination that the risk associated with the fibrous insulation in STPNOC's containment buildings is low enough to meet the requirements of Regulatory Guide (RG) 1.174, ‘An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions On Plant Specific Changes to the Licensing Basis.’”

The risk-informed approach will not be dependent on the results of further Westinghouse testing, analysis, nor the NRC acceptance of such testing and analysis as documented in a Westinghouse Commercial Atomic Power (WCAP) report. In addition, the risk-informed approach will not utilize previous sump strainer testing for determination of strainer head loss. As such, STPNOC does not intend to provide a response to the open Requests for Additional Information (RAIs) identified in Reference 3.

The risk-informed approach commitment made in the attachment replaces two previous commitments related to additional Westinghouse testing and WCAP reports. These commitments were made in References 4 and 5 and are listed in the attachment. There are no other regulatory commitments in this letter.

If there are any questions regarding this amendment request, please contact Jamie Paul at (361) 972-7344 or me at (361) 972-7867.



D.W. Rencurrel  
Chief Nuclear Officer

JLP

Attachment: Regulatory Commitments

cc:

(paper copy)

Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Balwant K. Singal  
Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North (MS 8 B1)  
11555 Rockville Pike  
Rockville, MD 20852

Senior Resident Inspector  
U. S. Nuclear Regulatory Commission  
P. O. Box 289, Mail Code: MN116  
Wadsworth, TX 77483

C. M. Canady  
City of Austin  
Electric Utility Department  
721 Barton Springs Road  
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire  
Morgan, Lewis & Bockius LLP

Balwant K. Singal  
U. S. Nuclear Regulatory Commission

John Ragan  
Chris O'Hara  
Jim von Suskil  
NRG South Texas LP

Kevin Pollo  
Richard Pena  
City Public Service

Peter Nemeth  
Crain Caton & James, P.C.

C. Mele  
City of Austin

Richard A. Ratliff  
Texas Department of State Health Services

Alice Rogers  
• Texas Department of State Health Services

### Regulatory Commitments

Commitments to be deleted:

<b>Commitment</b>	<b>Current Due Date</b>	<b>CR Action No.</b>
When the final Safety Evaluation for WCAP-16793, "Long Term Cooling" is issued, STP will review it for impact; and the evaluation of long term cooling will be revised as appropriate.	15 June, 2012	02- 5326-120
Testing plan and contingency options provide assurance that the GSI-191 and GL 2004-02 issues will be resolved for STP Units 1 and 2 by December 31, 2009.	1 April, 2013	02-5326-113

New commitment:

<b>Commitment</b>	<b>Current Due Date</b>	<b>CR Action No.</b>
Submit a License Amendment Request (LAR) based on a risk-informed approach to resolve GSI 191 for STP.	28 March, 2013	11-4249-7