

## PMSTPCOL PEmails

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**From:** Foster, Rocky  
**Sent:** Tuesday, March 05, 2013 6:03 PM  
**To:** 'Elton, Loree'; 'Scheide, Richard'; 'wemookhoek@STPEGS.COM'; Pohida, Marie  
**Cc:** STPCOL; McKenna, Eileen; Lee, Samuel; Karas, Rebecca; Wunder, George  
**Subject:** Draft RAI 6588.docx  
**Attachments:** draft RAI 6588.docx

Dick,

Attached are the draft RAIs for Fukushima for our discussion tomorrow during the Open Items telecom.

Thanks,

Rocky

**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 3571

**Mail Envelope Properties** (26E42474DB238C408C94990815A02F09BCA6D142AF)

**Subject:** Draft RAI 6588.docx  
**Sent Date:** 3/5/2013 6:03:17 PM  
**Received Date:** 3/5/2013 6:03:19 PM  
**From:** Foster, Rocky

**Created By:** Rocky.Foster@nrc.gov

**Recipients:**

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	146	3/5/2013 6:03:19 PM
draft RAI 6588.docx	17555	

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

## Request for Additional Information

Issue Date:

Application Title: South Texas Project Units 3 and 4 - Dockets 52-012 and 52-013

Operating Company: South Texas Project Nuclear Operating Co

Docket No. 52-012 and 52-013

Review Section: 01.05 - Other Regulatory Considerations

Application Section: 1.05

### QUESTION 23874

The staff has reviewed the applicant's response to RAI 01.05-2 regarding SFP instruments and has questions regarding Section 1.6 power supplies. The applicant stated that the permanently installed instrumentation channels will be powered by separate Non-Class 1E Vital power supplies powered by the CTG. The independent alternate sources used for instrument channel power will have sufficient capacity to maintain the level indication function until offsite resource capability is reasonably assured. These power supplies will be stored in a Seismic Category I building and will be easily accessible for timely installation. This information is consistent with the NRC Order EA-12-051 and Interim Staff Guidance (ISG) JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Instrumentation," (ML12221A339) dated August 29, 2012, which endorses the Nuclear Energy Institute (NEI) 12-02, "Industry guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation". The ISG provides an acceptable method for satisfying Order EA-12-051.

In regards to the applicant's response to RAI 01.05-2, the CTG is only designed for the 100 yr wind speed of 134 mph based on ASCE/SEI 7-05. Given the two hundred year wind speed of 142 mph, the CTG cannot be assumed to be operable, and the independent alternate sources will be needed to provide SFP instrumentation.

- a. Please document in the FSAR if these independent alternate power supplies are the same portable DC power supplies that will be procured under FLEX as discussed in RAI response 01.05-4.
- b. The Order EA-12-051 states that, "Based upon the considerations set forth above, the Commission has determined that all power reactor licensees and CP holders must have a reliable means of remotely monitoring wide-range spent fuel pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event." Please include the SFP instruments and the independent alternate DC power sources in the Reliability Assurance Program or justify why it is not necessary even though the Order EA-12-051 states that the SFP level indication should be reliable.
- c. Please document in the FSAR whether these alternate power supplies will be able to provide sufficient power for 24 hours following a high wind exceeding 134 mph. On-site and off-site debris may prevent offsite resources from reaching the site. If these alternate power supplies cannot provide sufficient power for 24 hours following a high wind event, please justify why this instrumentation can be considered "reliable" as stated in the Order EA-12-051.

### **QUESTION 23875**

Based on the public telephone call with STP on January 16, 2013, the staff was informed that STP plans to place one diesel driven fire water pump in each unit with respect to NTTF Recommendation 4.2 External Events, in the context of high winds at beyond design basis wind speeds. Each diesel driven fire water pump will be housed in the Reactor Building (a Cat 1 structure). The staff is requesting STP to document in the FSAR:

(1) that one diesel driven fire water pump will be housed in each unit, in the Reactor Building; and

(2) clarify whether both diesel driven fire water pumps will be included in the Reliability Assurance Program (RAP). One diesel driven fire water pump is already included in the RAP as described in Chapter 19. If the applicant does not propose to include both diesel driven fire water pumps in the RAP, please justify why this is appropriate.

### **QUESTION 24731**

Based on the public telephone call with STP on January 16, 2013, the staff was informed that STP agreed to remove the following statements regarding NTTF 2.1 on External Flooding from the response to RAI 01.05-1 and the associated FSAR content, since there was no engineering analysis to support the statements.

“Additionally, an MCR breach is highly improbable because:

- Overtopping of the embankment is not possible due to very large freeboard:
- An MCR embankment failure at any point except a very small portion of the 12.4 mile embankment perimeter has no impact on site structures ”

The staff requests the applicant to confirm that these statements are removed from STP's response to NTTF 2.1 on External Flooding that is contained in the response to RAI 01.05-1 and the FSAR.