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April 10, 2013  
U7-C-NINA-NRC-130026

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

South Texas Project  
Units 3 and 4  
Docket Nos. 52-012 and 52-013  
Response to Request for Additional Information

Reference: Letter: Rocky D. Foster to Scott Head "Request for Additional Information Letter No. 417 Related to SRP Section 01.05 for the Nuclear Innovation North America LLC Combined License Application" (ML121230021) dated May 2, 2012.

Attached is a revised response to NRC staff question 01.05-3 which was included in the Request for Additional Information (RAI) letter referenced above. The attachment provides the Revision 2 response to the following RAI question which supersedes the previous response in its entirety.

01.05-3

The COLA markups contained in this submittal will be incorporated in the next routine COLA revision following NRC acceptance of this RAI response.

There are no commitments in this letter.

If you have any questions, please contact Scott Head at (979) 316-3014 or Bill Mookhoek at (979) 316-3011.

STI 33680766

DO91  
NRO

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

Executed on 4-10-2013.



Mark McBurnett  
Chief Executive Officer and Chief Nuclear Officer  
Nuclear Innovation North America LLC

rhs

Attachment:

RAI 01.05-3, Revision 2

cc: w/o attachment except\*  
(paper copy)

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**01.05-3, Revision 2**

By letter dated April 25, 2012, the NRC staff informed you that the NRC staff has been directed by the Commission to implement the Fukushima Near-Term Task Force recommendations contained in SECY-12-0025, "Proposed Orders and Requests for Information in Response to Lessons Learned from Japan's March 11, 2011, Great Tohoku Earthquake and Tsunami" dated February 17, 2012. This request for additional information (RAI) specifically addresses Recommendation 9.3, "provisions for enhancing emergency preparedness." The NRC staff requests that you address each of the provisions for enhancing emergency preparedness as described in Enclosure 7 of SECY-12-0025, including any proposals for changes to your current application.

**Response:**

The revision 1 response to the subject RAI was submitted with letter U7-NINA-NRC-120062, dated December 6, 2012. RAI 01.05-3, Revision 2 is being provided in response to NRC staff questions raised during subsequent discussions of this issue and supersedes the previous response in its entirety. The STP 3 & 4 COLA Part 2 Tier 2, Appendix 1E and COLA Part 9, Table 4.0-1 will be revised as shown below in shaded text in the next routine revision of the COLA following NRC acceptance of this response.

COLA Part 2 Tier 2, Appendix 1E:

**1E.2.8 Enhanced Emergency Plan Staffing and Communication (9.3)**

The Emergency Plan for STP 3 and 4 will be part of a site-wide emergency plan for Units 1 through 4. NEI 12-01, Revision 0 (Guidelines for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities) will be used in assessing staff and communications capabilities necessary to respond to a beyond design basis multi-unit event. The results of the assessment will be addressed in the detailed Emergency Plan procedures developed during implementation of operational programs as described in FSAR Section 13.4S and in concert with STP Units 1 and 2. COLA Part 9 Table 4.0-1, Items 5.3, 5.4, 10.3, and 10.4 lists the ITAACs applicable to the Emergency Plan and its implementing procedures. to the staffing and communications capability assessments.

**COLA PART 9: Inspections, Tests, Analyses, Acceptance Criteria**

**Table 4.0-1 Emergency Planning-Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)**

EP Program Elements	Inspections, Tests, Analysis	Acceptance Criteria
<p>5.3 The licensee has performed an assessment of on-site and off-site communications systems and equipment required during an emergency event to ensure communications capabilities can be maintained during prolonged station blackout conditions in accordance with NEI 12-01 "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0</p>	<p>5.3 An assessment will be completed</p>	<p>5.3 A report exists documenting that within two (2) years prior to scheduled initial fuel load of STP Unit 3, an assessment was performed of the on-site and offsite communications systems and equipment required during an emergency event to ensure communications capabilities can be maintained during prolonged station blackout conditions in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0</p>
<p>5.4 Corrective actions required by the assessment conducted per ITAAC 5.3 have been implemented, including any related emergency plan and implementing procedure changes and associated training</p>	<p>5.4 An assessment will be performed</p>	<p>5.4 A report exists that documents that, the licensee completed implementation of required corrective actions associated with the assessment conducted per ITAAC 5.3, including any related emergency plan and implementing procedure changes and associated training</p>

**Table 4.0-1 Emergency Planning-Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)**

EP Program Elements	Inspections, Tests, Analysis	Acceptance Criteria
<p>10.3 The licensee has performed an assessment of the on-site and augmented staffing capability to satisfy the regulatory requirements for response to a multi-unit event in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0</p>	<p>10.3 An assessment will be completed</p>	<p>10.3 A report exists documenting that within two years prior to the scheduled initial fuel load of STP Unit 3, an assessment was performed of the on-site and augmented staffing capability to satisfy the regulatory requirements for response to a multi-unit event in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0 was performed.</p>
<p>10.4 Revise Emergency Plan as required by assessment conducted per Item 10.3</p>	<p>10.4 An assessment will be performed</p>	<p>10.4 A report exists that documents that the Emergency Plan was revised as required by the assessment conducted in Item 10.3, to include the following:</p> <ul style="list-style-type: none"> <li>• Incorporation of corrective actions identified in the staffing assessments described above</li> <li>• Identification of how the augmented staff will be notified given degraded communications capabilities</li> </ul>