

June 24, 2013

Mr. Scott Head, Manager  
Regulatory Affairs  
STP Units 3 & 4  
Nuclear Innovation North America, LLC  
122 West Way, Suite 405  
Lake Jackson, TX 77566

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 425 RELATED TO  
SRP SECTION 01.05 FOR THE NUCLEAR INNOVATION NORTH AMERICA,  
LLC COMBINED LICENSE APPLICATION

Dear Mr. Head:

By letter dated September 20, 2007, South Texas Project (STP) submitted for approval a combined license application pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within **30** days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

S. Head

- 2 -

If you have any questions or comments concerning this matter, I can be reached at 301-415-5787 or by e-mail at [rocky.foster@nrc.gov](mailto:rocky.foster@nrc.gov) or you may contact George Wunder at 301-415-1494 or [george.wunder@nrc.gov](mailto:george.wunder@nrc.gov).

Sincerely,

*/RA/*

Rocky D. Foster, Project Manager  
Licensing Branch 3  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos.: 52-012  
52-013

eRAI Tracking No.: 7136

Enclosure:  
Request for Additional Information

cc: William Mookhoek  
Richard Scheide  
Loree Elton

S. Head

- 2 -

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**ADAMS ACCESSION NO.:** ML13171A255

NRO-002

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\*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

## **Request for Additional Information 425**

Issue Date: 6/20/2013

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: 01.05

### **QUESTIONS**

#### **01.05-11**

In regards to the response to RAI 01.05-5, the staff reviewed the applicant's response and determined that the response is insufficient to completely address the staff's concerns. The NRC staff needs sufficient information in order to reach a safety conclusion within the COLA review. The applicant should address the specific provisions in Interim Staff Guidance (ISG) JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (ML12229A174) dated August 29, 2012 that endorses the Nuclear Energy Institute (NEI) 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide". The ISG provides an acceptable method for satisfying Order EA-12-049. As stated in the ISG, other methods may be used to satisfy Order EA-12-049, but these methods will be reviewed by the NRC staff on a case-by-case basis to determine their acceptability. If the applicant proposes to use methods that differ from those in the ISG and endorsed guidance, the applicant should explain why these alternative methods are acceptable. Examples where additional information is needed include the following:

1. Demonstrate that after the load shed of the dc batteries the power supplies needed for Phase 1 core cooling will be available.
2. Discuss the environmental qualification of the dc batteries. Demonstrate that the qualification temperature will not be exceeded in the battery room at 36 hours into an extended loss of ac power (ELAP).
3. List the power sources under ELAP for all the valves and pumps that will be required for mitigation strategies for Phase 1 and for Phase 3 respectively including core cooling, containment overpressure protection, and spent fuel pool cooling. Also, identify all the manual operations for the pumps and valves.

Enclosure