

## PMSTPCOL PEmails

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**From:** Foster, Rocky  
**Sent:** Wednesday, July 10, 2013 9:19 AM  
**To:** Richard Scheide; 'leelton@ninalc.net'  
**Cc:** STPCOL  
**Subject:** draft RAI 7182.docx  
**Attachments:** draft RAI 7182.docx

Dick,

Here's the latest draft RAI for the Fukushima 4.2 RAI response. I'm out of the office tomorrow & Friday but will be back on Monday.

Thanks,

Rocky

**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 3624

**Mail Envelope Properties** (26E42474DB238C408C94990815A02F09DED3C60183)

**Subject:** draft RAI 7182.docx  
**Sent Date:** 7/10/2013 9:18:59 AM  
**Received Date:** 7/10/2013 9:19:42 AM  
**From:** Foster, Rocky

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

**Recipients:**

"STPCOL" <STP.COL@nrc.gov>  
Tracking Status: None  
"Richard Scheide" <rhscheide@ninallc.net>  
Tracking Status: None  
"leelton@ninallc.net" <leelton@ninallc.net>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

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MESSAGE	177	7/10/2013 9:19:42 AM
draft RAI 7182.docx	25076	

**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: 01.05

### QUESTIONS

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.

In response to RAI 422, Question 01.05-5, the applicant submitted "STP 3&4 ABWR FLEX Integrated Plan" to address issues related to Fukushima Near-Term Task Force (NTTF) Recommendation 4.2, "Mitigation". On page 3 of 60 of the FLEX Plan, the first paragraph states, *"At STP 3&4, the 20 MWe CTGs are housed in structures which protect them from design floods and site severe weather events. ... Although the CTGs are not specifically protected from wind generated missiles, at STP 3&4, the CTGs are located in the Turbine Buildings separated by approximately 900 feet and failure of both due to wind generated missiles is considered to be extremely unlikely. ..."*

In the cited paragraph above, the applicant indicates that the Turbine Buildings (TBs) will house Combustion Turbine Generators (CTGs) and protect them from design floods and site severe weather events. It also states that the CTGs are located in the TBs separated by approximately 900 feet and failure of both due to wind generated missiles is considered to be extremely unlikely.

In Chapter 3 of STP 3&4 FSAR (Revision 9), Table 3H.9-1 indicates that only the lateral load resisting system of the TBs will be evaluated against stability and II/I interactions under the effects of extreme environmental conditions including earthquake, tornado and tornado missiles, hurricane and hurricane missiles, and flood. The Table also indicates that the TBs (except for the lateral load resisting system) are not designed against tornado and tornado missiles, hurricane and hurricane missiles, or flood (page 3H-242). Although the likelihood of the simultaneous failure of both CTGs located in the TBs due to tornado- or hurricane-generated missiles is low, the CTGs in the TBs are potentially vulnerable to the wind effects of tornado and hurricane.

The staff requests that the applicant clarify how the statements cited above from the FLEX plan can be reconciled with the information presented in Table 3H.9-1 of the FSAR. Specifically, the applicant is requested to clearly describe in the FLEX plan and updated FSAR how the CTGs located in the TBs are protected against the effects of tornado, hurricane, and flood.