

## PMSTPCOL PEmails

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**From:** Foster, Rocky  
**Sent:** Thursday, October 17, 2013 2:31 PM  
**To:** Richard Scheide (rhscheide@ninallc.net); 'leelton@ninallc.net' (leelton@ninallc.net)  
**Cc:** STPCOL  
**Subject:** draft RAI 7276.docx  
**Attachments:** draft RAI 7276.pdf

Dick,

Attached is the draft RAI on the Fukushima Mitigative Strategies that you requested before the Fed. Govt. S/D. Please review and provide feedback to me as to whether STP feels the need for a telecom for clarification.

Thanks,

Rocky

**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 3697

**Mail Envelope Properties** (26E42474DB238C408C94990815A02F0901114B76CE2D)

**Subject:** draft RAI 7276.docx  
**Sent Date:** 10/17/2013 2:30:54 PM  
**Received Date:** 10/17/2013 2:30:56 PM  
**From:** Foster, Rocky

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

**Recipients:**

"STPCOL" <STP.COL@nrc.gov>

Tracking Status: None

"Richard Scheide (rhscheide@ninallc.net)" <rhscheide@ninallc.net>

Tracking Status: None

"leelton@ninallc.net" (leelton@ninallc.net) <leelton@ninallc.net>

Tracking Status: None

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

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	263	10/17/2013 2:30:56 PM
draft RAI 7276.pdf	87256	

**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

### **QUESTION**

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.

NEI 12-06 Chapter 11, "Programmatic Controls," summarizes the programmatic controls to be considered in the implementation of the plant-specific FLEX strategies. It contains discussions of quality attributes, equipment design, equipment storage, procedure guidance, maintenance and testing, training, staffing, and configuration control. The staff has reviewed the report of STP 3 & 4 ABWR FLEX Integrated Plan submitted in a letter, U7-C-NINA-NRC-130031, dated May 2, 2013, as described in page 19 of 60, which stated a program for STP 3 & 4 to be in place 180 days prior to fuel load. The staff found the description of the program lacking in specificity and therefore concludes that it is not adequate for the licensing purpose. Further, in advance of potential rulemaking for mitigation strategies, the staff seeks a binding requirement. Other COL applicants have used a "license condition" with reference to the ISG or other documents to satisfy similar NRC licensing requirements. The staff requests that you propose a license condition or provide justification why it is not necessary.