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September 15, 2014
U7-C-NINA-NRC-140027
10 CFR Part 21

U. S. Nuclear Regulatory Commission
Document Control Desk
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South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Nuclear Innovation North America Response to General Electric-Hitachi
Final 10CFR Part 21 Report

On August 29, 2014, General Electric-Hitachi (GEH) Nuclear Energy submitted a final 10CFR Part 21 report summarizing an investigation into a non-conservative assumption in the hydrodynamic load definition for the Advanced Boiling Water Reactor (ABWR). GEH had previously submitted interim reports on this subject on March 31, 2014, and June 26, 2014. The GEH final evaluation concluded that the predicted increase in the suppression pool water level above the value used for defining the ABWR loads and applied in structural analysis will not result in a Substantial Safety Hazard or lead to exceeding a Technical Specification Safety Limit for the US ABWR Certified Design.

Nuclear Innovation North America (NINA) and Toshiba Corporation have completed a separate evaluation of this issue. A change to the assumption of TS high suppression pool level to a higher level as an input to the load calculation has an insignificant (less than 1%) impact on the containment structure. The other structures that could be affected, most notably the access tunnel, have not been designed yet. However, analyses considering the Japanese ABWR access tunnels indicate that the increases in combined loads are relatively small, and sufficient margin exists to accommodate these increases.

NINA concludes that evaluation of this non-conservative assumption results in an insignificant change for the STP 3&4 design and, as such, does not require a change to the STP 3&4 application. Additionally NINA agrees with the GEH conclusion that this issue does not result in a Substantial Safety Hazard for the US ABWR design as defined under 10 CFR Part 21.

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The Toshiba report on this evaluation is available for review by the NRC Staff at their convenience in the Westinghouse Rockville office.

There are no commitments in this letter.

Should you have any questions regarding this matter, please contact Bill Mookhoek at 979-316-3014 or myself at 979-316-3011.

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

Executed on 9/15/14

Scott Head
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wem

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

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