



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 31, 2014

Mr. Dennis L. Koehl  
President and CEO/CNO  
STP Nuclear Operating Company  
South Texas Project  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - PLAN FOR THE ONSITE  
AUDIT REGARDING IMPLEMENTATION OF MITIGATING STRATEGIES  
AND RELIABLE SPENT FUEL INSTRUMENTATION RELATED TO ORDERS  
EA-12-049 AND EA-12-051 (TAC NOS. MF0825, MF0826, MF0827, AND  
MF0828)

Dear Mr. Koehl:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" and Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). The orders require holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review, Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13070A011), STP Nuclear Operating Company (STP, the licensee) submitted its OIP for South Texas Project, Units 1 and 2 (STP) in response to Order EA-12-049. By letters dated August 26, 2013, February 27, 2014, and August 27, 2014 (ADAMS Accession Nos. ML13249A060, ML14073A458, and ML14251A029, respectively), STP submitted its first three six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit process led to the issuance of the STP interim staff evaluation (ISE) and audit report on January 29, 2014 (ADAMS Accession No. ML13339A736), and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13070A006), the licensee submitted its OIP for STP in response to Order EA-12-051. By letter dated June 7, 2013 (ADAMS Accession No. ML13149A092), the NRC staff sent a request for additional information (RAI) to the licensee. By letters dated June 25, 2013, August 27, 2013, February 27, 2014, and August 27, 2014 (ADAMS Accession Nos. ML13190A466, ML13249A078, ML14066A388, and ML14251A028, respectively), the licensee submitted its RAI responses and first three six-month updates to the OIP.

The NRC staff's review led to the issuance of the STP ISE and RAI dated September 19, 2013 (ADAMS Accession No. ML13254A210). By letter dated March 26, 2014 (ADAMS Accession No. ML14083A620), the NRC notified all licensees and construction permit holders that the staff is conducting in-office and onsite audits of their responses to Order EA-12-051 in accordance with NRC NRR Office Instruction LIC-111, as discussed above.

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the spent fuel pool instrumentation ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns. The audit's onsite portion will occur prior to declarations of compliance for the first unit at each site.

This document outlines the onsite audit process that occurs after ISE issuance as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents/Final Integrated Plans, and continue in-office audit communications with staff while proceeding towards compliance with the orders.

The staff plans to conduct an onsite audit at STP in accordance with the enclosed audit plan from February 9-13, 2015.

If you have any questions, please contact me at 301-415-1924 or by e-mail at [Tony.Brown@nrc.gov](mailto:Tony.Brown@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Brown', with a long horizontal line extending to the right.

Tony Brown, Project Manager  
Orders Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-498 and 50-499

Enclosure:  
Audit plan

cc w/encl: Distribution via Listserv

**Audit Plan  
South Texas Project, Units 1 and 2**

**BACKGROUND AND AUDIT BASIS**

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" and Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). Order EA-12-049 directs licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool (SFP) cooling capabilities in the event of a beyond-design-basis external event (BDBEE). Order EA-12-051 requires, in part, that all operating reactor sites have a reliable means of remotely monitoring wide-range SFP levels to support effective prioritization of event mitigation and recovery actions in the event of a BDBEE. The orders require holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 to submit for review their Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13070A011), STP Nuclear Operating Company (STP, the licensee) submitted its OIP for South Texas Project, Units 1 and 2 (STP) in response to Order EA-12-049. By letters dated August 26, 2013, February 27, 2014, and August 27, 2014 (ADAMS Accession Nos. ML13249A060, ML14073A458, and ML14251A029, respectively), STP submitted its first three six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit process led to the issuance of the STP interim staff evaluation (ISE) and audit report on January 29, 2014 (ADAMS Accession No. ML13339A736), and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13070A006), the licensee submitted its OIP for STP in response to Order EA-12-051. By letter dated June 7, 2013 (ADAMS Accession No. ML13149A092), the NRC staff sent a request for additional information (RAI) to the licensee. By letters dated June 25, 2013, August 27, 2013, February 27, 2014, and August 27, 2014 (ADAMS Accession Nos. ML13190A466, ML13249A078, ML14066A388, and ML14251A028, respectively), the licensee submitted its RAI responses and first three six-month updates to the OIP.

The NRC staff's review led to the issuance of the STP ISE and RAI dated September 19, 2013 (ADAMS Accession No. ML13254A210). By letter dated March 26, 2014 (ADAMS Accession No. ML14083A620), the NRC notified all licensees and construction permit holders that the staff is conducting in-office and onsite audits of their responses to Order EA-12-051 in accordance with NRC NRR Office Instruction LIC-111, as discussed above.

Enclosure

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the spent fuel pool instrumentation (SFPI) ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns. The audit's onsite portion will occur prior to declarations of compliance for the first unit at each site.

This document outlines the onsite audit process that occurs after ISE issuance as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents (OPDs)/Final Integrated Plans (FIPs), and continue in-office audit communications with staff while proceeding towards compliance with the orders.

Following the licensee's declarations of order compliance, the NRC staff will evaluate the OIPs, as supplemented, the resulting site-specific OPDs/FIPs, and, as appropriate, other licensee submittals based on the requirements in the orders. For Order EA-12-049, the staff will make a safety determination regarding order compliance using the Nuclear Energy Institute (NEI) guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" issued in August 2012 (ADAMS Accession No. ML12242A378), as endorsed by NRC Japan Lessons-Learned Project Directorate (JLD) 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'" (ADAMS Accession No. ML12229A174) as providing one acceptable means of meeting the order requirements. For Order EA-12-051, the staff will make a safety determination regarding order compliance using the NEI guidance document NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12240A307), as endorsed, with exceptions and clarifications, by NRC ISG JLD-ISG-2012-03 "Compliance with Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12221A339) as providing one acceptable means of meeting the order requirements. Should the licensee propose an alternative strategy or other method deviating from the guidance, additional staff review will be required to evaluate if the alternative strategy complies with the applicable order.

## AUDIT SCOPE

As discussed, onsite audits will be performed per NRR Office Instruction LIC-111, "Regulatory Audits," to support the development of safety evaluations. Site-specific OIPs and OPDs/FIPs rely on equipment and procedures that apply to all units at a site, therefore, audits will be planned to support the "first unit at each site." Onsite audits for subsequent units at a site will be on an as-needed basis.

The purpose of the audits is to obtain and review information responsive to the STP OIPs, as supplemented, open and confirmatory items from the mitigation strategies ISE, RAI responses from the SFPI ISE, and to observe and gain a better understanding of the basis for the site's overall programs to ensure the licensee is on the correct path for compliance with the Mitigation Strategies and SFPI orders. These may include, but are not limited to:

- Onsite review and discussion for the basis and approach for detailed analysis and calculations (Orders EA-12-049, EA-12-051);
- Walk-throughs of strategies and staging of equipment to assess feasibility, timing, and effectiveness of a given mitigating strategy or integration of several strategies (Order EA-12-049);
- Storage, protection, access, and deployment feasibility and practicality for onsite portable equipment (Order EA-12-049);
- Evaluation of staging, access, and deployment of offsite resources to include National SAFER Response Center (NSRC) provided equipment (Order EA-12-049); and
- Review dimensions and sizing of the SFP area, placement of the SFP level instrumentation, and applicable mounting methods and design criteria (Order EA-12-051).

**NRC AUDIT TEAM**

<b>Title</b>	<b>Team Member</b>
Team Lead and Project Manager	Tony Brown
Technical Support – Reactor Systems	Joshua Miller
Technical Support - Electrical	Matthew McConnell
Technical Support – Balance of Plant	Garry Armstrong
Technical Support - SFPI	Khoi Nguyen

**LOGISTICS**

The audit will be conducted onsite at STP on February 9-13, 2015. Entrance and exit briefings will be held with the licensee at the beginning and end of the audit, respectively, as well as daily briefings of team activities. Additional details will be addressed over the phone. A more detailed schedule is provided below.

A private conference room is requested for NRC audit team use with access to audit documentation upon arrival and as needed.

**DELIVERABLES**

An audit report/summary will be issued to the licensee within 90 days from the end of the audit.

## INFORMATION NEEDS

- Materials/documentation provided in responses to open or confirmatory items and RAIs in the ISEs;
- OPD/FIP (current version), operator procedures, FLEX Support Guidelines (FSGs), operator training plans, NSRC (SAFER) STP Response Plan; and
- Materials/documentation for staff audit questions and/or licensee OIP identified open items

To provide supplemental input to the ongoing audit of documents submitted to the NRC and made available via e-portal, the onsite audit will have three components: 1) a review of the overall mitigating strategies for the site, including, if needed, walk-throughs of strategies and equipment staging of select portions; 2) a review of material relating to open or confirmatory items and RAIs from the ISEs, staff audit questions, and licensee-identified open items; and 3) additional specific issues requested by NRC technical reviewers related to preparation of a safety evaluation. Each part is described in more detail below:

### Part 1 - Overall Mitigating Strategies and Program Review:

During the onsite audit, please be prepared to conduct a tabletop discussion of the site's integrated mitigating strategies and SFPI compliance program. This discussion should address the individual components of the plans, as well as the integrated implementation of the strategies including a timeline. The licensee team presenting this should include necessary representatives from site management, engineering, training, and operations that were responsible for program development, and will be responsible for training and execution.

Following the tabletop discussion, please be prepared to conduct walk-throughs of procedures and demonstrations of equipment as deemed necessary by NRC audit team members. Include representatives from engineering and operations that will be responsible for training and execution. At this time we expect, at a minimum, to walk-through the items below. Based on the tabletop presentations and audit activities, this list may change.

WALK-THROUGH LIST:

1. Walk-through a sample of strategies that will be delineated by specific NRC technical staff audit team members
2. Walk-through of portable and/or pre-staged (FLEX) diesel generator (DG) strategies/procedures, to include power supply pathways, areas where manual actions are required, and electrical isolation
3. Walk-through of building access procedures, to include any unique access control devices
4. Strategy walk-through of transfer routes from staging and storage areas to deployment locations for both onsite and offsite portable equipment
5. Strategy walk-through for core cooling and reactor coolant system (RCS) inventory, to include portable pumping equipment, flow paths, and water sources and the related reactor systems analysis and calculations
6. Walk-through of communications enhancements
7. Walk-through of SFP area, SFPI locations, and related equipment mounting areas
8. Walk-through of procedures for load shed, with an operator who would perform this procedure during an event, demonstrating the steps needed to perform the load shed

Part 2 – Specific Technical Review Items:

During the visit, the following audit items will be addressed from the licensee's ISEs (open items, confirmatory items, and SFPI RAIs); audit question list; licensee OIP, as supplemented, open items; and draft safety evaluation additional questions. Please provide documents or demonstrations as needed to respond to each item.

Part 3 – Specific Topics for Discussion:

1. Draft of STP OPD/FIP
2. Reactor systems analyses
3. Training
4. Portable (FLEX) equipment maintenance and testing
5. NSRC (SAFER) Response Plan
6. The licensee's plan for coordination with Texas state authorities for delivery of Phase 3 FLEX equipment.
7. Check the status of upgrades to the site's communications systems as noted in NRC letter dated June 6, 2013 (ADAMS Accession No. ML13142A160)

### **Proposed Schedule**

#### **Onsite Day 1, Monday, February 9, 2015**

- 0800 Audit team arrives onsite for badging/dosimetry
- 1000 Entrance meeting/licensee presentation of strategies
- 1600 NRC audit team meeting
- 1630 Team lead daily debrief/next day planning with licensee

#### **Onsite Day 2, Tuesday, February 10, 2015**

- 0800 Check in onsite
- 0830 NRC audit team activities:
  - Technical area break-out discussions between NRC and licensee staff in the areas of reactor systems, electrical, balance-of-plant/structures, SFPI, and others
  - Review documents relating to open or confirmatory items, RAIs, codes, analyses, etc.
- 1200 Lunch
- 1300 NRC audit team activities:
  - Technical area break-out discussions between NRC and licensee staff in the areas of reactor systems, electrical, balance-of-plant/structures, SFPI, and others
  - Review documents relating to open or confirmatory items, RAIs, codes, analyses, etc.
- 1600 NRC audit team meeting
- 1630 Team lead daily debrief/next day planning with licensee

#### **Onsite Day 3, Wednesday, February 11, 2015**

- 0800 Check in onsite
- 1200 Lunch
- 1300 Continue NRC audit team activities
- 1600 NRC audit team meeting
- 1630 Team lead daily debrief/next day planning with licensee



**Onsite Day 4, Thursday, February 12, 2015**

0800 Check in onsite

1200 Lunch

1300 Continue NRC audit team activities

1330 NRC audit team meeting

1630 NRC/Licensee pre-exit meeting

**Onsite Day 5, Friday, February 13, 2015**

0800 Check in at Innsbrook Technical Center/NRC audit team exit meeting preparation

0900 NRC/Licensee exit meeting

1000 Audit closeout/departure

ML14251A028, respectively), the licensee submitted its RAI responses and first three six-month updates to the OIP.

The NRC staff's review led to the issuance of the STP ISE and RAI dated September 19, 2013 (ADAMS Accession No. ML13254A210). By letter dated March 26, 2014 (ADAMS Accession No. ML14083A620), the NRC notified all licensees and construction permit holders that the staff is conducting in-office and onsite audits of their responses to Order EA-12-051 in accordance with NRC NRR Office Instruction LIC-111, as discussed above.

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the spent fuel pool instrumentation ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns. The audit's onsite portion will occur prior to declarations of compliance for the first unit at each site.

This document outlines the onsite audit process that occurs after ISE issuance as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents/Final Integrated Plans, and continue in-office audit communications with staff while proceeding towards compliance with the orders.

The staff plans to conduct an onsite audit at STP in accordance with the enclosed audit plan from February 9-13, 2015.

If you have any questions, please contact me at 301-415-1924 or by e-mail at [Tony.Brown@nrc.gov](mailto:Tony.Brown@nrc.gov).

Sincerely,  
**/RA/**  
 Tony Brown, Project Manager  
 Orders Management Branch  
 Japan Lessons-Learned Division  
 Office of Nuclear Reactor Regulation

Docket Nos.: 50-498 and 50-499

Enclosure:  
 Audit plan

cc w/encl: Distribution via Listserv

**DISTRIBUTION:**

PUBLIC  
 JOMB R/F  
 RidsNrrDorLpl4-1Resource  
 RidsNrrPMSouthTexas Resource  
 RidsNrrLASLent Resource  
 RidsAcrcAcnw\_MailCTR Resource

RidsRgn4MailCenter Resource  
 TBrown, NRR/JLD  
 CRoque-Cruz, NRR/JLD

**ADAMS Accession No. ML14363A103**

\* via email

OFFICE	NRR/JLD/JOMB/PM	NRR/JLD/LA	NRR/JLD/JCBB/BC	NRR/JLD/JERB/BC
NAME	TBrown	SLent	SBailey (BHeida for)	BPham
DATE	12/29/14	12/29/14	12/29/14	12/30/14
OFFICE	NRR/DORL/LPL4-1/PM	NRR/JLD/JOMB/BC(A)	NRR/JLD/JOMB/PM	
NAME	BSingal (FLyon for)	CRoque-Cruz	TBrown	
DATE	12/31/14	12/29/14	12/31/14	