



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

May 13, 2015

LICENSEE: STP Nuclear Operating Company

FACILITY: South Texas Project, Units 1 and 2

SUBJECT: SUMMARY OF APRIL 8, 2015, PUBLIC MEETING WITH STP NUCLEAR OPERATING COMPANY TO DISCUSS THE LICENSE AMENDMENT AND EXEMPTION REQUESTS TO USE A RISK-INFORMED APPROACH TO THE RESOLUTION OF GENERIC SAFETY ISSUE 191, "ASSESSMENT OF DEBRIS ACCUMULATION ON PWR SUMP PERFORMANCE" (TAC NOS. MF2400, MF2401, MF2402, MF2403, MF2404, MF2405, MF2406, MF2407, MF2408, AND MF2409)

On April 8, 2015, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of STP Nuclear Operating Company (STPNOC, the licensee), at NRC Headquarters, Rockville, Maryland. The meeting notice and agenda, dated February 13, 2015, are located in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML15091A578. The licensee's handouts from the meeting are available in ADAMS at Accession Nos. ML15098A605 and ML15098A606. A list of meeting attendees is provided in the Enclosure to this meeting summary.

By letter dated June 19, 2013 (ADAMS Accession No. ML131750250), as supplemented by letters dated October 3, October 31, November 13, November 21, and December 23, 2013 (two letters); and January 9, February 13, February 27, March 17, March 18, May 15 (two letters), May 22, June 25, and July 15, 2014; and March 10, and March 25, 2015 (ADAMS Accession Nos. ML13295A222, ML13323A673, ML13323A128, ML13338A165, ML14015A312, ML14015A311, ML14029A533, ML14052A053, ML14072A076, ML14086A383, ML14087A126, ML14149A353, ML14149A354, ML14149A434, ML14178A481, ML14202A045, ML15072A092, and ML15091A440, respectively), STPNOC submitted exemption requests accompanied by a license amendment request (LAR) for a risk-informed approach to resolve Generic Safety Issue (GSI)-191, "Assessment of Debris Accumulation on PWR [Pressurized-Water Reactor] Sump Performance," at South Texas Project, Units 1 and 2 (STP).

The purpose of this public teleconference call was to discuss the licensee's proposed structure of the methodology change submittal which the licensee plans to provide to the NRC staff in June 2015. The June 2015 supplement is expected to provide information on the new Risk over Deterministic methodology, and modify the license amendment and exemption requests. Also, the NRC staff provided initial feedback on the licensee's request for additional information (RAI) Round 2 responses dated March 25, 2015.

### **Meeting Summary**

The NRC staff discussed the "Max Debris Loading Strainer Head Loss psi [pounds per square inch] vs. Temperature F [degrees Fahrenheit]" graph provided by STPNOC (ADAMS Accession

No. ML15098A605). This was used as an aid in clarifying the licensee's response to the NRC's Mechanical and Civil Engineering Branch (EMCB) question 2 from the March 25, 2015, STPNOC response. The staff stated that the graph clarifies STPNOC's response, but needs to be submitted formally as a supplement to the question. STPNOC stated it would include this clarification to EMCB question 2 in the June supplement (the June supplement was discussed in the February 4, 2015, public meeting summary, which is available in ADAMS at Accession No. ML15084A003).

In response to the NRC staff's questions, the licensee acknowledged that the text associated with Table 4 in the RAI response incorrectly stated that all risk results were calculated by STPNOC from Regulatory Guide (RG) 1.174, Revision 2, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant Specific Changes to the Licensing Basis," May 2011 (ADAMS Accession No. ML100910006), acceptance guidelines for core damage frequency (CDF) and large, early release frequency (LERF) (i.e., Region III of RG 1.174), except when the 95th percentile LOCA frequencies from NUREG-1829, "Estimating Loss-of-Coolant Accident (LOCA) Frequencies Through the Elicitation Process," April 2008 (ADAMS Accession No. ML082250436), were used. Region III in RG 1.174 indicates "very small" changes in risk. The NRC staff agreed that this was incorrect and should be corrected to state that the 95th percentile and mean values for arithmetic mean LOCA frequencies from NUREG-1829 produced risk results in excess of RG 1.174, Region III. STPNOC staff agreed to make this correction.

NRC staff stressed that the June supplement should provide a strong basis for using the risk-informed methodology by discussing the principles in RG 1.174 including defense-in-depth and safety margins with respect to the analyzed design characteristics.

STPNOC and the NRC staff discussed the progress made concerning the calculation techniques used by the licensee to analyze the number of welds expected to generate debris loads in excess of deterministic thresholds. The staff received additional information on March 10, 2015, that has allowed staff to better understand STPNOC's CASA Grande results (CASA Grande is the software providing the integrated probabilistic risk analysis framework).

The STPNOC staff offered to provide draft sections to the NRC staff for review as they become available to discuss during upcoming public meetings. The next scheduled public meeting is April 22, 2015, at 3:00 p.m. eastern time (meeting notice and agenda available in ADAMS at Accession No. ML15091A578).

STPNOC and the NRC staff discussed some of the logistics of the proposed CASA Grande audit. The licensee offered to hold the audit in Albuquerque, New Mexico, during the week of May 11, 2015. NRC staff will verify that the proposed week is acceptable to the staff, will provide an expected duration, and discussion topics by April 11.

### **Action Items**

STPNOC staff will include a supplemental response to the strainer structural question, EMCB question 2 from the licensee's response dated March 25, 2015.

NRC staff will confirm a proposed audit dates and timeframe, and provide draft audit discussion topics to STPNOC staff by Friday, April 10, 2015.

No Public Meeting Feedback Forms were received for this meeting.

Please direct any inquiries to me at 301-415-1906, or [lisa.regner@nrc.gov](mailto:lisa.regner@nrc.gov).

Sincerely,

Handwritten signature of Lisa M. Regner in cursive script.

Lisa M. Regner, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

APRIL 8, 2015, CONFERENCE CALL WITH STP NUCLEAR OPERATING COMPANY

REGARDING RISK-INFORMED APPROACH TO RESOLUTION OF GSI-191

SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

<b>NAME</b>	<b>ORGANIZATION</b>
Lisa Regner	U.S. Nuclear Regulatory Commission (NRC)
John Stang	NRC
Victor Cusumano	NRC
Caroline Tilton	NRC
Ashley Guzzetta	NRC
Tim Lupold	NRC
CJ Fong	NRC
Mike Murray	STP Nuclear Operating Company (STPNOC)
Steve Blossom	STPNOC
Drew Richards	STPNOC
Ernie Kee	STPNOC
Wayne Harrison	STPNOC
Wes Schulz	STPNOC
Mark Wales	STPNOC
Linda Dyer	STPNOC
Bruce Letellier	Alion
Ron Holloway	Wolf Creek Nuclear Generating Corporation
Jeremy Tejada	University of Texas at Austin
Tim Sande	Enercon

Enclosure

No Public Meeting Feedback Forms were received for this meeting.

Please direct any inquiries to me at 301-415-1906, or [lisa.regner@nrc.gov](mailto:lisa.regner@nrc.gov).

Sincerely,

*/Siva P Lingam for/*

Lisa M. Regner, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
List of Attendees

cc w/encl: Distribution via Listserv

**DISTRIBUTION:**

PUBLIC	RidsNrrDssStsb Resource	CFong, NRR/DRA/APLA
LPL4-1 r/f	RidsNrrLAJBurkhardt Resource	JStang, NRR/DSS/SSIB
RidsAcrsAcnw_MailCTR Resource	RidsNrrPMSouthTexas Resource	DBoirel, NRR/DSS/SSIB
RidsNrrDeEpn Resource	RidsRgn4MailCenter Resource	SLaur, NRR/DRA/APLA
RidsNrrDeEsgb Resource	MWaters, EDO RIV	MBanks, ACRS
RidsNrrDoriLpl4-1 Resource	TWertz, NRR	RElliott, NRR/DSS/STSB
RidsNrrDraApla Resource	SSmith, NRR/DSS/SSIB	KWest, NRR/DSS/STSB
RidsNrrDssScvb Resource	PKlein, NRR/DE/ESGB	ASallman, NRR/DSS/SCVB
RidsNrrDssSnpb Resource	MYoder, NRR/DE/ESGB	Tsao, NRR/DE/EPNB
RidsNrrDssSrx Resource	VCusumano, NRR/DSS/SSIB	LWard, NRR/DSS/SNPB
RidsNrrDssSsib Resource	AGuzzetta, NRR/DSS/SRXB	

**ADAMS Accession No.: ML15103A002**

\* per email

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/LA	NRR/DSS/SSIB/BC	NRR/DSS/STSB/BC
NAME	LRegner	JBurkhardt	VCusumano	RElliott
DATE	4/22/15	4/20/15	4/24/15	4/23/15
OFFICE	NRR/DRA/APLA/BC	NRR/DE/EMCB/BC	NRR/DORL/LPL4-1/BC	NRR/DORL/LPL4-1/PM
NAME	HHamzehee	TLupold	MMarkley (LRegner for)	LRegner (SLingam for)
DATE	4/22/15	4/22/15	5/13/15	5/13/15

**OFFICIAL RECORD COPY**