



Nuclear Innovation
North America LLC
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July 7, 2015
U7-C-NINA-NRC-150007

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Explanation of Transportation Physical Security Plan Details

Reference: Letter, Scott Head to Document Control Desk, "Submittal of Combined License Application Revision 12," dated April 21, 2015, U7-C-STP-NRC-150005

The referenced letter submitted revision 12 of the STP 3&4 Combined License Application. Part 2 Tier 2 Section 13.6.4 of that application contains a description of the Transportation Physical Security Plan. In discussions with the NRC Staff questions arose on how the requirements of 10CFR73.67(g)(2)(i), (ii), and (iii) will be met.

As stated in the reference, Nuclear Innovation North America (NINA) will have written agreements in place with the fuel manufacturer to transport the fuel to the STP 3&4 site under the manufacturer's Transportation Physical Security Plan. The fuel manufacturer must be licensed under Part 70, and the carrier will have a general license pursuant to 10CFR70.20b. The written agreement will require the manufacturer to be licensed, to have a Transportation Physical Security Plan, and to arrange for in-transit physical protection. These arrangements will satisfy the requirements of 10CFR73.67(g)(2)(iii) for NINA.

NINA will have in place receipt inspection procedures to receive the fuel. The fuel will not change ownership until the successful completion of the receipt inspection. As part of these procedures, NINA will include requirements to inspect the integrity of the containers and the tamper seals upon receipt of the shipment. Procedural steps will also require NINA to notify the shipper of receipt of the material as required in 10CFR74.15.

As requested by the NRC Staff, NINA will revise FSAR Table 13.4S -1, Item 15 to include the Transportation Physical Security Plan in the first FSAR revision following issuance of the COL.

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Commitments in this letter are listed in the Attachment.

If you have any questions regarding this response, please contact Scott Head at 979-316-3011 or Bill Mookhoek at 979-316-3014.

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

Executed on 7-7-2015

A handwritten signature in black ink, appearing to read "M A McBurnett", with a long horizontal stroke extending to the right.

Mark McBurnett
Chief Executive Officer and Chief Nuclear Officer
Nuclear Innovation North America LLC

wem

Attachment: Summary of Commitments

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

(electronic copy)

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SUMMARY OF COMMITMENTS

Commitment	Description
2015-69	NINA will include a requirement in the written agreement required by FSAR section 13.6.4 that the fuel manufacturer will be licensed, will have a Transportation Physical Security Plan, and will arrange for in-transit physical protection.
2015-70	NINA will develop procedures for the receipt inspection of new fuel. The procedure will include a requirement to inspect the integrity of the containers and the tamper seals upon receipt of the shipment.
2015-71	NINA will develop procedures for the receipt inspection of new fuel. The procedure will include a requirement for NINA to notify the shipper of receipt of the material as required in 10CFR74.15.
2015-72	NINA will revise FSAR Table 13.4S-1, Item 15 to include the Transportation Physical Security Plan in the first FSAR revision following issuance of the COL