



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

August 26, 2015
NOC-AE-15003287
10 CFR 2.202

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 & 2

Docket Nos. STN 50-498, STN 50-499

STPNOC Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order
Modifying Licenses with Regard to Requirements for Mitigation Strategies
For Beyond-Design-Basis External Events (Order EA-12-049) (TAC Nos. MF0825 and MF0826)

References:

1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events", March 12, 2012 (ML12073A195)
2. Letter from D.W. Rencurrel, STPNOC, to NRC Document Control Desk, "Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", October 24, 2012 (ML12310A389) (NOC-AE-13002909)
3. Letter from D.L. Koehl, STPNOC, to NRC Document Control Desk, "STPNOC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", February 28, 2013 (ML13070A011) (NOC-AE-13002963)
4. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "STPNOC First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", August 26, 2013 (ML13249A060) (NOC-AE-13003027)
5. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "STPNOC Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", February 27, 2014 (ML14073A458) (NOC-AE-14003089)
6. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "STPNOC Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)(TAC Nos. MF0825 and MF0826)", August 27, 2014 (ML14251A029) (NOC-AE-14003162)

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7. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "STPNOC Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)(TAC Nos. MF0825 and MF0826)", February 26, 2015 (ML15075A019) (NOC-AE-15003224)
8. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "Notification of Compliance with Orders EA-12-049 for Mitigation Strategies for Beyond-Design-Basis External Events and EA-12-051 for Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0826 and MF0828)", July 2, 2015 (ML15196A031) (NOC-AE-15003257)
9. Nuclear Energy Institute (NEI) Guidance 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, August 21, 2012 (ML12242A378)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049 (Reference 1) to South Texas Project Nuclear Operating Company (STPNOC) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. The purpose of this letter is to provide the fifth six-month status report pursuant to Section IV, Condition C.2, of EA-12-049 delineating progress made in implementing the requirements of EA-12-049.

The Attachment included with this letter provides updates to milestone accomplishments since the last status report including any changes to the compliance method, schedule, or need for relief and the associated basis.

Per the requirements of Reference 1, STPNOC submitted an initial status report (Reference 2) and an Overall Integrated Plan (OIP) pursuant to Section IV, Condition C of the Order (Reference 3). STPNOC has submitted four status updates to the Overall Integrated Plan (References 4-7) as well as a notification of compliance with Order EA-12-049 for STP Unit 2 (Reference 8).

There have been no significant changes to the STP FLEX strategies since the submittal of the last six-month status report and the Unit 2 compliance letter (References 7-8).

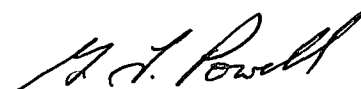
Direction regarding the content of the status reports is provided in NEI 12-06 (Reference 9).

This letter contains no new regulatory commitments.

If there are any questions regarding this letter, please contact Wendy Brost at (361) 972-8516 or me at (361) 972-7566.

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

Executed on: August 26, 2015



G. T. Powell
Site Vice President

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Attachment: STP Nuclear Operating Company (STPNOC) Fifth Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

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STP Nuclear Operating Company (STPNOC) Fifth Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

1. Introduction

There have been no significant changes to the STP FLEX strategies since the submittal of the last six-month status report and the Unit 2 compliance letter (References 4-5).

STP Unit 2 came in to full compliance with Order EA-12-049 on May 7, 2015. Plant modifications are ongoing for STP Unit 1 and will be completed prior to the startup from refueling outage 1RE19.

2. Milestone Accomplishments

- STP Unit 2 came into full compliance with Order EA-12-049 on May 7, 2015.
- The Order EA-12-049 compliance letter for STP Unit 2 was submitted July 2, 2015 (Reference 5). The compliance letter includes a response to each of the open and pending issues listed in the NRC tracking system for STP.
- Plant modifications for FLEX strategies have been completely evaluated and field installations are ongoing for STP Unit 1.

3. Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan (Reference 1). It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the order implementation date. Items in bold have been changed since the last status update.

<u>Milestone</u>	<u>Target Completion Date</u>	<u>Activity Status</u>	<u>Revised Target Completion Date</u>
Submit 60 Day Status Report	October 2012	Complete	None
Submit Overall Integrated Plan	February 2013	Complete	None
Submit 6 Month Updates:			
Update 1	August 2013	Complete	None
Update 2	February 2014	Complete	None
Update 3	August 2014	Complete	None
Update 4	February 2015	Complete	None
Update 5	August 2015	Complete	None

<u>Milestone</u>	<u>Target Completion Date</u>	<u>Activity Status</u>	<u>Revised Target Completion Date</u>
Update 6	February 2016	Not Started	-
Update 7	August 2016	Not Started	-
FLEX Strategy Evaluation	September 2013	Complete	None
Walk-throughs or Demonstrations	December 2014	Started	April 2015 November 2015
Perform Staffing Analysis	December 2013	Complete	None July 2015
Modifications:			
Modifications Evaluation	September 2013	Complete	None
Unit 1 Design Engineering	January 2014	Started	October 2015
Unit 1 Implementation Outage	October 2015	Not started	-
Unit 2 Design Engineering	January 2014	Complete	April 2015
Unit 2 Implementation Outage	April 2015	Complete	None
Storage (outside Protected Area):			
Storage Design Engineering	September 2013	Complete	May 2014
Storage Implementation	April 2015	Complete	None
FLEX Equipment:			
Procure On-Site Equipment	January 2014	Complete	June 2015
Develop Strategies with Regional Response Center	October 2013	Complete	April 2015
Procedures:			
PWROG ¹ issues NSSS ² -specific guidelines	April 2015	Complete	None
Create Site-Specific FSGs ³	April 2015	Started	November 2015
Create Maintenance Procedures	May 2014	Complete	April 2015
Training:			
Develop Training Plan	May 2014	Complete	Jan 2015
Training Complete	September 2014	Complete	April 2015 March 2015
Unit 1 FLEX Implementation	October 2015	Started	-
Unit 2 FLEX Implementation	April 2015	Complete	May 2015
Submit Completion Report and Final Integrated Plan	-	Started	October 2015 January 2016

¹ PWROG – Pressurized Water Reactor Owner's Group

² NSSS – Nuclear Steam Supply System

³ FSG –FLEX Support Guidelines

4. Changes to Compliance Method

There have been no changes to the compliance method since the submittal of the last six-month status report and the Unit 2 compliance letter (References 4-5).

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

STPNOC expects to comply with the Order implementation date and no relief/relaxation is required at this time.

6. Open Items from Overall Integrated Plan, the Draft Safety Evaluation and the Mitigating Strategies Audit

The Order EA-12-049 compliance letter for STP Unit 2 was submitted July 2, 2015 (Reference 5). The compliance letter includes a response to each of the open and pending issues listed in the NRC tracking system for STP.

7. Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

8. References

The following references support the updates to the Overall Integrated Plan described in this attachment.

1. Letter from D.L. Koehl, STPNOC, to NRC Document Control Desk, "STPNOC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", February 28, 2013 (ML13070A011) (NOC-AE-13002963)
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012. (ML12054A735) (AE-NOC-12002268)
3. Letter from J.S. Bowen, NRC, to D.L. Koehl, STPNOC, "South Texas Project, Units 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies)", January 29, 2014. . (ML13339A736) (AE-NOC-14002494)
4. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "STPNOC Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)(TAC Nos. MF0825 and MF0826)", February 26, 2015 (ML15075A019) (NOC-AE-15003224)
5. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "Notification of Compliance with Orders EA-12-049 for Mitigation Strategies for Beyond-Design-Basis External Events and EA-12-051 for Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0826 and MF0828)", July 2, 2015 (ML15196A031) (NOC-AE-15003257)