



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

October 5, 2015

LICENSEE: STP Nuclear Operating Company

FACILITY: South Texas Project

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON AUGUST 6, 2015 BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND STP NUCLEAR OPERATING COMPANY, CONCERNING REQUEST FOR ADDITIONAL INFORMATION, SET 32, PERTAINING TO THE SOUTH TEXAS PROJECT, LICENSE RENEWAL APPLICATION (TAC. NOS. ME4936 AND ME4937)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company held a telephone conference call on August 6, 2015, to discuss and clarify the staff's requests for additional information (RAIs) concerning the South Texas Project, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a summary of the RAI discussions, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA/

John W. Daily, Senior Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:

1. List of Participants
2. List of Requests for Additional Information

cc: Listserv

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NAME	YEdmonds	JDaily	YDiaz-Sanabria	JDaily
DATE	9/ 28 /2015	9/ 30 /2015	10/ 2 /2015	10/ 5 /2015

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TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
AUGUST 6, 2015

PARTICIPANT

AFFILIATION

John Daily

Nuclear Regulatory Commission (NRC)

Bill Holston

NRC

Giovanni Facco

NRC

Arden Aldridge

STP Nuclear Operating Company (STPNOC)

Rafael Gonzales

STPNOC

Gary Warner

Worley Parsons

SUMMARY OF CONFERENCE CALL
STP LICENSE RENEWAL APPLICATION
CONCERNING DRAFT RAI SET 32
AUGUST 6, 2015

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held a telephone conference call on August 6, 2015, to discuss the staff's Request for Additional Information (RAI), RAI Set 32, for the South Texas Project, Units 1 and 2, license renewal application (LRA). The telephone conference call was useful in clarifying the staff's concerns in the RAI.

Discussion:

The staff and the applicant held a conference call on the draft RAIs contained in RAI Set 32 in order to clarify and ensure a common understanding of the information being requested. Those issues and requests are presented below.

The staff agreed to look further into some of the points raised as presented below, prior to issuing the final version of the requests. Actions or changes agreed to in the call, or resolved shortly thereafter, are presented as part of the respective RAI's discussion.

The applicant agreed to take the staff's concerns into consideration as it prepares its responses.

Individual RAI drafts

RAI B2.1.18-5a, Buried piping – soil sampling periodicity

Issue:

Given that soil conditions can change over time, the staff lacks sufficient information to conclude that the licensing basis during the period of extended operation will be adequate. As amended by letter dated June 11, 2015, the licensing basis could result in only one set of soil samples being conducted.

Request:

State the basis for why the licensing basis during the period of extended operation will be adequate in regard to the periodicity of soil sampling.

Discussion:

No additional clarification was needed for this item.

RAI B2.1.13-5a, LR-ISG-2013-01 inspection frequency follow-up

Issue:

Two issues were presented:

1. Aging Management Program (AMP) XI.M42 Table 4a Footnote 3 states that a 6-year inspection interval may be extended to 12 years if: (a) the identical coating/lining material was installed with the same installation requirements in redundant trains with the same operating conditions and at least one of the trains is inspected every 6 years; and (b) the coating/lining is not in a location subject to erosion that could result in mechanical damage to the coating/lining. The staff lacks sufficient information to conclude that all internally-coated open-cycle cooling water system components are: identical, installed with the same installation requirements, inspected such that at least one train is inspected every 6 years, located in areas with the same operating conditions; and not located in an area subject to erosion. The staff also noted that portions of the essential cooling water system are subject to erosion (e.g., downstream of control valves, pump discharge). LR-ISG-2013-01, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks," AMP XI.M42, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks," recommends that when peeling, delamination, blisters, or rusting are observed during inspections or when cracking and flaking that does not meet acceptance criteria is observed during inspections, the subsequent inspection interval is 4 years instead of 6 years. The responses to RAI 3.0.3-2a Part (d) and RAI B2.1.13-5a state that the specific degraded coatings will be replaced. However, with a known degradation mechanism potentially occurring in other locations with the same coating and environment, the staff concluded that inspections should be conducted more frequently than if no degradation was noted in prior inspections. The staff lacks sufficient information to conclude that a 6-year inspection interval is adequate when the extent of coating degradation, similar to the observed degradation that was repaired, is not known.
2. The extent of blistering, peeling, and delamination is not typically detectable by visual inspection alone. The "corrective actions" program element of LR-ISG-2013-01, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks," AMP XI.M42, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks," recommends that testing or examination be conducted to ensure that the extent of repaired coatings/linings encompasses sound material.

Request:

1. Four response items were identified:
 - a. State whether the internally-coated open-cycle cooling water system components satisfy all of the provisions of Footnote 3 in AMP XI.M42, Table 4a.

- b. Justify why locations downstream of control valves and pump discharges are not subject to erosion.
 - c. Justify the basis for the proposed inspection interval for the coatings being managed for loss of coating integrity in the Fire Water System Program and Internal Surfaces in Miscellaneous Piping and Ducting Components Program.
 - d. State and justify the basis for how the extent of coatings that could be experiencing similar degradation to the coating areas that were repaired will be determined in a reasonable time frame.
2. The RAI also requests information on whether: (a) testing and examination will be conducted prior to and during the repair to ensure that replaced coatings encompasses sound coating material; and (b) the testing will include physical techniques in addition to visual examination.

Discussion:

Of the 2 issues in this RAI, Issue 2 and its requests did not require modifying as a result of the call. The discussion of Issue 1 initially resulted in reducing its scope so that it would focus on requests for details regarding LR-ISG-2013-01 subsequent inspection intervals. The staff also observed that an adequate basis for inspecting EW pump internal coatings did not seem to be provided. Ultimately it became clear during further consideration of Issue 1) that this RAI may need further clarification, therefore it will be deleted from Set 32 and will be placed into a future set instead.

RAI B2.1.13-6a, Follow-up testing on repaired components

Issue:

LRA Sections A1.9, A1.13, and A1.22 were not revised to address performing physical testing where physically possible in conjunction with repair or replacement of coatings. Therefore, the licensing basis for the programs will not be consistent with SRP-LR Table 3.0-1, "FSAR Supplement for Aging Management of Applicable Systems." The staff cannot conclude that the licensing basis during the period of extended operation will be adequate without addressing physical testing associated with coating repairs or replacement.

Request:

State the basis for why the licensing basis for the Open-Cycle Cooling Water System, Fire Water System, and Internal Surfaces in Miscellaneous Piping and Ducting Components Programs during the period of extended operation will not include a statement related to follow-up testing requirements of coatings that are repaired.

Discussion:

No additional clarification was needed for this item.

RAI 3.0.3-2b, Extent of internally-coated components inspection

Issue:

LRA Sections B2.1.9, "Open-Cycle Cooling Water System Program," B2.1.13, "Fire Water System Program," and B2.1.22, "Internal Surfaces in Miscellaneous Piping and Ducting Components Program," were not revised to state the extent of inspections for internally coated components.

Request:

State why the percent of total coating surface being inspected was not included in LRA Sections B2.1.9, B2.1.13, and B2.1.22.

Discussion:

As a result of discussion, the staff agreed that adequate details have been already provided for B2.1.13, "Fire Water System Program," and B2.1.22, "Internal Surfaces in Miscellaneous Piping and Ducting Components Program." Therefore, additional clarification was only needed for LRA Sections B2.1.9, "Open-Cycle Cooling Water System Program," and associated internal coatings of the open-cycle cooling water system(s).

RAI 3.0.3-2c, Standard for holiday testing

Issue:

The response did not state the specific edition of the standards that will be used. The staff cannot complete its evaluation of the RAI response without the program stating the specific year of the standard. For example, the staff has endorsed the 2009 edition when conducting adhesion testing in accordance with ASTM [ASTM International] D4541, "Standard Test Method for Pull-Off Strength of Coatings Using Portable Adhesion Testers." During its review of the RAI response, the staff used the following editions:

- ASTM D5162-08, "Standard Practice for Discontinuity (Holiday) Testing of Nonconductive Protective Coating on Metallic Substrates"
- ASTM D7091-13, "Standard Practice for Nondestructive Measurement of Dry Film Thickness of Nonmagnetic Coatings Applied to Ferrous Metals and Nonmagnetic, Nonconductive Coatings Applied to Non-Ferrous Metals"
- Society For Protective Coatings (SSPC) standard SSPC PA-2 – January 2015, "Procedure for Determining Conformance to Dry Coating Thickness Requirements"

Request:

State the specific edition that will be used for the cited ASTM and SSPC standards.

Discussion:

No additional clarification was needed for this item.

RAI B2.1.20-5, External surfaces – inspection of inaccessible components

Issue:

It is not clear to the staff when inaccessible components will be inspected.

Request:

State the schedule for recurring inspections of inaccessible components to ensure the intended functions are maintained.

Discussion:

This RAI will be dropped since the staff verified that the issues were already addressed by the applicant's response to RAI B2.1.20-4 by letter dated September 15, 2011, on the docket.

Letter to STP Nuclear Operating Company from J. Daily Dated October 5, 2015

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