



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

October 5, 2015

Mr. G. T. Powell, Vice President  
Technical Support and Oversight  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION – SET 32 (TAC NOS. ME4936 AND ME4937)

Dear Mr. Powell:

By letter dated October 25, 2010, STP Nuclear Operating Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew operating licenses NPF-76 and NPF-80 for South Texas Project, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC) staff. The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

This request for additional information has been discussed with Mr. Arden Aldridge of your staff, and we request your response within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-3873 or by e-mail at [John.Daily@nrc.gov](mailto:John.Daily@nrc.gov).

Sincerely,

*/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

Enclosure:  
As stated

cc: Listserv

October 5, 2015

Mr. G. T. Powell, Vice President  
Technical Support and Oversight  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION – SET 32 (TAC NOS. ME4936 AND ME4937)

Dear Mr. Powell:

By letter dated October 25, 2010, STP Nuclear Operating Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew operating licenses NPF-76 and NPF-80 for South Texas Project, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC) staff. The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

This request for additional information has been discussed with Mr. Arden Aldridge of your staff, and we request your response within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-3873 or by e-mail at [John.Daily@nrc.gov](mailto:John.Daily@nrc.gov).

Sincerely,

**/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

Enclosure:  
As stated

cc: Listserv

DISTRIBUTION:  
See next page

**ADAMS Accession No.: ML15251A485**

\*concurrence via email

<b>OFFICE</b>	LA: DLR/RPB1	PM: DLR/RPB1	BC: DLR/RPB1	PM: DLR/RPB1
<b>NAME</b>	YEdmonds	JDaily	YDiaz-Sanabria	JDaily
<b>DATE</b>	9/ 28 /2015	9/ 30 /2015	10/ 2 /2015	10/ 5 /2015

**OFFICIAL RECORD COPY**

SOUTH TEXAS PROJECT, UNITS 1 AND 2  
REQUEST FOR ADDITIONAL INFORMATION - SET 32  
(TAC NOS. ME4936 AND ME4937)

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

Background:

The response to RAI B2.1.18-5, dated June 11, 2015, states that in order to demonstrate that the soil is not corrosive; soil sampling will be conducted every 10 years. License Renewal Application (LRA) Section A1.18 was revised to state that soil sampling will be conducted; however, the periodicity of the sampling was not stated.

SRP-LR Table 3.0-1, as modified by LR-ISG-2011-03 states “[i]f a reduction in the number of inspections recommended in Table 4a is claimed based on a lack of soil corrosivity as determined by soil testing, the updated final safety analysis report (UFSAR) program description should state that soil testing should be conducted once in each 10-year period starting 10 years prior to the period of extended operation.”

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.

**RAI B2.1.13-6a, Followup testing on repaired components**

Background:

The responses to RAI 3.0.3-2a and RAI B2.1.13-6, dated June 11, 2015, revised LRA Sections A1.9, A1.13, and A1.22, 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.

SRP-LR, Table 3.0-1, “FSAR Supplement for Aging Management of Applicable Systems,” as modified by LR-ISG-2013-01 states, “[f]or coated/lined surfaces determined to not meet the acceptance criteria, physical testing is performed where physically possible (i.e., sufficient room to conduct testing) in conjunction with repair or replacement of the coating/lining”

ENCLOSURE

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 followup testing requirements of coatings that are repaired.

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

Background:

LRA Section B2.1.9 was revised to state, "[c]oating installed to mitigate corrosion of the essential chiller water box covers, Standby Diesel Generator (SDG) jacket water coolers, SDG lube oil coolers, SD intercooler water boxes and interconnection piping are inspected and tested to assure coating integrity."

Issue:

It is not clear to the staff whether internal coatings installed for purposes other than corrosion (e.g., prevention of erosion damage) will be inspected.

Request:

State the basis for limiting coating inspections in the Open-Cycle Cooling Water System Program to those locations where the coatings were installed to mitigate corrosion.

**RAI 3.0.3-2c, Standard for holiday testing**

Background:

The response to RAI 3.0.3-2, dated June 3, 2014, cited several standards to conduct holiday testing, dry-film thickness measurements, and adhesion 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.

Letter to G.T. Powell from J. Daily dated October 5, 2015

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION – SET 32 (TAC NOS. ME4936 AND ME4937)

DISTRIBUTION:

**E-MAIL:**

PUBLIC

RidsNrrDir Resource

RidsNrrDirRpb1 Resource

RidsNrrDirRpb2 Resource

RidsNrrPMSTP Resource

RidsOgcMailCenter

-----  
JDaily

TTran

DMcIntyre, OPA

LRegner, DORL

WWalker, RIV

JDixon, RIV

BTharakan, RIV

WMaier, RIV

VDricks, RIV

NOKeefe, RIV

AVegel, RIV

GPick, RIV