

## **NRR-PMDAPEm Resource**

---

**From:** Regner, Lisa  
**Sent:** Wednesday, October 21, 2015 2:55 PM  
**To:** Wayne Harrison  
**Cc:** Sterling, Lance (lsterling@STPEGS.COM); Michael Murray; Stang, John; Markley, Michael; Pascarelli, Robert  
**Subject:** STP GSI-191 DRAFT Questions  
**Attachments:** QA-RAI.docx

Wayne,

The staff has identified two questions that are significant enough that we need to discuss them with you as soon as possible. The answers could have an impact on our review schedule and scope.

We'd like to have a call to discuss these with you this week, if possible.

Please let me know when you are available.

Thanks,  
Lisa

*Lisa Regner*  
Sr. PM  
NRR/DORL/LPL4-1  
301-415-1906  
O8D08

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2617

**Mail Envelope Properties** (e7d8ecdf42c847eaae6af3af636fd8e5)

**Subject:** STP GSI-191 DRAFT Questions  
**Sent Date:** 10/21/2015 2:55:10 PM  
**Received Date:** 10/21/2015 2:55:00 PM  
**From:** Regner, Lisa

**Created By:** Lisa.Regner@nrc.gov

**Recipients:**

"Sterling, Lance (Isterling@STPEGS.COM)" <Isterling@STPEGS.COM>  
Tracking Status: None  
"Michael Murray" <mpmurray@STpegs.com>  
Tracking Status: None  
"Stang, John" <>  
Tracking Status: None  
"Markley, Michael" <Michael.Markley@nrc.gov>  
Tracking Status: None  
"Pascarelli, Robert" <Robert.Pascarelli@nrc.gov>  
Tracking Status: None  
"Wayne Harrison" <awharrison@STPEGS.COM>  
Tracking Status: None

**Post Office:** HQPWMSMRS05.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	416	10/21/2015 2:55:00 PM
QA-RAI.docx	26276	

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

## STP GSI-191 DRAFT Questions

### Question 1:

It is unclear to the staff which portions of the South Texas Project current licensing bases are being modified per 10 CFR 50.90. Please provide a specific list of all licensing basis changes, in the GSI-191 application (including RAI responses and supplements), for which you are requesting NRC review and approval via 10 CFR 50.90.

### Question 2:

#### Background:

To address GL 2004-02, STP is demonstrating its compliance with 10 CFR 50.46(b)(5), "Long term core cooling", including the impact of debris, using the following two step approach:

- (1) The hot leg large break, hot leg medium break, hot leg small break, and cold leg small break will be demonstrated to be in compliance with 10 CFR 50.46(b)(5) by ensuring that the long term core temperature does not exceed 800° F assuming a fully blocked core. This is demonstrated by using deterministic analysis performed with RELAP5-3D.
- (2) The cold leg large break and cold leg medium break will rely on a risk informed approach.

The hot leg large break, hot leg medium break, hot leg small break, and cold leg small break analysis used to demonstrate compliance with 10 CFR 50.46(b)(5) is accident analysis. Therefore certain design control measures as specified in 10 CFR 50, Appendix B (III) are required:

*Design control measures shall be applied to items such as the following: reactor physics, stress, thermal, hydraulic, and accident analyses; compatibility of materials; accessibility for inservice inspection, maintenance, and repair; and delineation of acceptance criteria for inspections and tests.*

However, it is not apparent that the RELAP5-3D analysis was performed under a QA program which satisfies the requirements of Appendix B.

#### Request:

Demonstrate that the RELAP5-3D analysis was performed under a QA program which satisfies the requirements of 10 CFR 50, Appendix B, or provide a similar analysis which was performed under such a program.