



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

April 11, 2016

**LICENSEE:** STP Nuclear Operating Company

**FACILITY:** South Texas Project, Units 1 and 2

**SUBJECT:** SUMMARY OF MARCH 3, 2016, PUBLIC MEETING WITH STP NUCLEAR OPERATING COMPANY TO DISCUSS THE LICENSE AMENDMENT AND EXEMPTION REQUESTS TO USE A RISK-INFORMED APPROACH TO THE RESOLUTION OF GENERIC SAFETY ISSUE 191, "ASSESSMENT OF DEBRIS ACCUMULATION ON PWR SUMP PERFORMANCE" (CAC NOS. MF2400, MF2401, MF2402, MF2403, MF2404, MF2405, MF2406, MF2407, MF2408, AND MF2409)

On March 3, 2016, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of STP Nuclear Operating Company (STPNOC, the licensee), at NRC Headquarters, Rockville, Maryland. The meeting notice and agenda, dated February 18, 2016, are located in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML16050A006. A list of meeting attendees is provided in the Enclosure to this meeting summary.

By letter dated June 19, 2013 (ADAMS Accession No. ML131750250), as supplemented by letters dated October 3, October 31, November 13, November 21 and December 23, 2013 (two letters); and January 9, February 13, February 27, March 17, March 18, May 15 (two letters), May 22, June 25, July 15, 2014; and March 10, March 25, and August 20, 2015 (ADAMS Accession Nos. ML13295A222, ML13323A673, ML13323A128, ML13338A165, ML14015A312, ML14015A311, ML14029A533, ML14052A110, ML14072A075, ML14086A383, ML14087A126, ML14149A353, ML14149A354, ML14149A439, ML14178A467, ML14202A045, ML15072A092, ML15091A440, and ML15246A125, respectively), STPNOC submitted exemption requests accompanied by license amendment requests for a risk-informed approach to resolve Generic Safety Issue (GSI)-191, "Assessment of Debris Accumulation on PWR [Pressurized-Water Reactor] Sump Performance," at South Texas Project, Units 1 and 2 (STP).

The purpose of this public teleconference call was to discuss the NRC staff's remaining unresolved concerns associated with the licensee's August 20, 2015, document. This submittal provided information on STPNOC's revised methodology to resolve GSI-191 using a risk combined with a deterministic – 'Risk over Deterministic' or 'RoverD' – methodology. In particular, the staff discussed the outcomes of the thermal-hydraulic (T-H) and debris generation regulatory audits conducted in College Station, Texas, and Albuquerque, New Mexico, respectively, during the week of February 22, 2016. Additionally, the NRC and STP staffs discussed the containment analysis impact due to Westinghouse Electric Company LLC (Westinghouse) errors, STPNOC's draft RAI [Request for Additional Information] Applicability Matrix, and the regulatory audit associated with probabilistic risk planned for April 2016.

The NRC staff discussed an option that STPNOC may exercise concerning shifting all hot-leg loop, large-break loss-of-coolant accident (LOCA) locations to a risk-informed methodology to simplify the analysis. The licensee noted that if this option were to be used, it would mean four additional locations on the hot-leg loop vessel nozzles would be moved from a deterministic analysis, to a risk-informed analysis. If the licensee exercised this option, only the hot-leg medium break, hot-leg small break, and cold-leg small break locations would need to demonstrate deterministic compliance per paragraph 50.46(b)(5) of Title 10 of the *Code of Federal Regulations*. Further, the licensee discussed a T-H modeling assumption change involving allowing the core bypass to be open to allow flow in the axial direction during the long-term core cooling analysis. The assumption of allowing bypass flow was addressed in a Westinghouse guidance document, WCAP-17788, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) - Cold Leg Break (CLB) Evaluation Method for GSI-191 Long-Term Cooling," which the NRC staff is currently reviewing.

The NRC staff requested that the licensee provide a clarification in its next submittal concerning steam line break assumptions in the risk analysis model. The August 20, 2015, submittal did not address the secondary system break assumptions, yet the submittal was stated to be a "stand-alone reference." Earlier STP submittals clearly stated the assumptions used in the analysis. This request was provided in a draft RAI by e-mail on March 22, 2016 (ADAMS Accession No. ML16082A484).

The NRC and STPNOC staffs discussed the licensee's draft RAI Applicability Matrix (ADAMS Accession No. ML16091A005). The NRC staff stated that there are questions on the scope of the review due to the methodology change from the original submittals in 2013. The RAI Applicability Matrix does not address this. The NRC staff stated that the licensee needs to provide assurance that the later submittal(s) do not disagree with earlier information, if it is not made clear that information is superseded.

The next public meetings will be held on March 17 and 31, 2016.

There were no public comments and no meeting feedback forms submitted.

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If you have any questions, please contact me at 301-415-1906 or via e-mail at [Lisa.Regner@nrc.gov](mailto:Lisa.Regner@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "m. regner for". The signature is written in a cursive, somewhat informal style.

Lisa M. Regner, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
List of Attendees

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LIST OF ATTENDEES MARCH 3, 2016, CONFERENCE CALL  
WITH STP NUCLEAR OPERATING COMPANY  
REGARDING RISK-INFORMED APPROACH TO RESOLUTION OF GSI-191  
SOUTH TEXAS PROJECT, UNITS 1 AND 2  
DOCKET NOS. 50-498 AND 50-499

<b>NAME</b>	<b>ORGANIZATION</b>
Lisa Regner	U.S. Nuclear Regulatory Commission (NRC)
Vic Cusumano	NRC
Robert Pascarelli	NRC
Josh Kaizer	NRC
Reed Anzalone	NRC
Steve Laur	NRC
Andrea Russell	NRC
Jeremy Dean	NRC
C. J. Fong	NRC
Matt Yoder	NRC
Caroline Tilton	NRC
Rob Engen	STP Nuclear Operating Company (STPNOC)
Ernie Kee	STPNOC
Wayne Harrison	STPNOC
Steve Blossom	STPNOC
Wes Schulz	STPNOC
Drew Richards	STPNOC
Bruce Letellier	Alion Science & Technology
Megan Stachowiak	Alion Science & Technology
Dominic Munoz	Alion Science & Technology
Rodolfo Vaghetto	Texas A&M
Ron Holloway	Wolf Creek Nuclear Operating Company
Brian Krystek	Engineering Planning and Management, Inc.
Tim Sande	ENERCON

Enclosure

If you have any questions, please contact me at 301-415-1906 or via e-mail at [Lisa.Regner@nrc.gov](mailto:Lisa.Regner@nrc.gov).

Sincerely,

**/RA MWatford for/**

Lisa M. Regner, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
List of Attendees

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KWest, NRR/DSS/STSB  
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JTsoo, NRR/DE/EPNB  
LWard, NRR/DSS/SNPB  
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LRobinson, NRR/DSS/SSIB

**ADAMS Accession No. ML16092A044**

\* per email

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/LA	NRR/DRA/APLA/TL	NRR/DSS/SSIB/BC
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DATE	4/11/2016	3/31/2016	4/05/2016	4/05/2016
OFFICE	NRR/DSS/SNPB/BC	NRR/DORL/LPL4-1/BC	NRR/DORL/LPL4-1/PM	
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DATE	4/06/2016	4/08/2016	4/11/2016	

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