



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

June 30, 2016
NOC-AE-16003328
10 CFR 50.54(f)

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Second Supplement to Response to Request for Information Pursuant to 10 CFR 50.54(f)
Regarding Recommendation 9.3 of the Near-Term Task Force Review of Insights from the
Fukushima Dai-ichi Accident – Phase 2 Staffing Assessment (TAC Nos. MF5379 and MF5380)

References:

1. Letter from A. Capristo, STPNOC, to NRC Document Control Desk, "Response to Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident – Phase 2 Staffing Assessment", November 25, 2014 (NOC-AE-14003189)
2. Letter from E.J. Leeds, NRC, to All Power Reactor Licensees, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident", March 12, 2012 (AE-NOC-12002269)(ML12053A340)
3. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "Supplement to Response to Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident – Phase 2 Staffing Assessment", July 2, 2015 (NOC-AE-15003255)
4. STPNOC Procedure, 0POP12-ZO-FSG06, "Alternate AWFST Makeup", Revision 1, November 10, 2015 (STI 34237577)
5. Letter from G.T. Powell, STPNOC, to NRC Document Control Desk, "Notification of Full Compliance with Order EA-12-049 for Mitigation Strategies for Beyond Design Basis External Events and Update for Order EA-12-051 for Reliable Spent Fuel Pool Instrumentation", February 17, 2016 (NOC-AE-15003311)(ML16067A088)

ADID
NRR

STI: 34263704

On November 25, 2014, South Texas Project Nuclear Operating Company (STPNOC) submitted the Phase 2 Staffing Assessment to the NRC (Reference 1) in response to the 10 CFR 50.54(f) request for information regarding Near-Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness Programs (Reference 2). STPNOC performed a revalidation of the assessment results using the final validated FLEX Support Guidelines (FSGs) and any applicable new procedures that were not complete when the staffing assessment tabletop was performed and submitted the results on July 2, 2015 (Reference 3).

During the implementation outage for Unit 1 in October 2015, STP determined that an additional personnel action was needed for one of the FLEX strategies. In an event such as a flood from an embankment breach of the Main Cooling Reservoir that leads to onsite flooding, the Trailer-Mounted Diesel-Driven Pumps (TMDDPs) may not be able to be used to transfer water to the Auxiliary Feedwater Storage Tank (AFWST) until later in the event. In this case, STP FLEX Support Guideline FSG-06, "Alternate AFWST Makeup", directs operators to use the Condensate Deaerator (DA) Storage Tank as a makeup water source to the AFWST until flood waters recede (Reference 4).

FSG-06 directs operators to connect hoses between the DA and the Auxiliary Feed Pump Test Line Drain Valve as an alternate method for supplying makeup water to the AFWST. Prior to opening the drain valve, STP determined that the DA must be vented for at least seven hours to preclude the release of two-phase water into the transfer hoses. Given this time constraint, the venting action should be performed within the first two hours from the start of the event. Steam suits and hearing protection have been staged in the Turbine Generator Building (TGB) that can be used for completing this venting action (Reference 4).

Note that this strategy will only be used in the case of significant flooding onsite.

FSG-06 was revised to include the DA venting actions, however, these actions were not included in the Phase 2 staffing assessment.

STP reviewed the results of the revalidated Phase 2 Staffing Assessment (Reference 3) and determined that there would be a staff member in each unit who could perform this task, if needed, among the on-shift staff available. These personnel, designated as Fire Brigade 1 and 2 (FB1/FB2) in the Staffing Assessment, were initially tasked with performing support roles during the time period needed to perform the venting action. This action was also being performed by maintenance personnel at the same time, so FB1 and FB2 can assume this duty without adversely impacting the results of the staffing assessment.

No additional staff are needed to support this change. The current minimum on-shift staff plus the two additional IMT maintenance personnel identified in the revalidated Phase 2 Staffing Assessment (Reference 3), and the augmented Emergency Response Organization (ERO) are sufficient for executing all required initial and any necessary transition phase actions for the FLEX strategies without the assignment of collateral duties that would adversely affect the ability to execute required Emergency Plan functions. No change to the Emergency Plan on-shift staffing level or augmented ERO is required.

Completing this venting action supports the revised FLEX Sequence of Events timeline included as part of the STPNOC Full Compliance Letter and Final Integrated Plan for Order EA-12-049 (Reference 5).

An update to the revised task implementation timeline from the Phase 2 Staffing Assessment revalidation that includes the actions to open the vent valve and install hoses to support the alternate AFWST fill strategy is provided in Enclosure 1. As shown in Enclosure 1, no collateral duties were identified. A revised timeline of key plant operator and maintenance activities is provided in Enclosure 2 as additional supporting information for the implementation timeline.

The status of the commitments listed in the Phase 2 Staffing Assessment (Reference 3) are included in Enclosure 3. There are no new commitments in this letter.

If there are any questions regarding this letter, please contact Wendy Brost at (361) 972-8516 or me at (361) 972-7697.

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

Executed on June 30, 2016
Date



A. Capristo
Executive Vice President and
Chief Administrative Officer

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Enclosures:

1. Update to Revised Task Implementation Timeline from Phase 2 Staffing Assessment Revalidation
2. Revised Timeline of Key Plant Operator and Maintenance Activities
3. Status of Commitments

cc:
(Paper Copy)

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Enclosure 1

**Update to Revised Task Implementation Timeline from
Phase 2 Staffing Assessment Revalidation**

Revised Task Implementation Timeline from Phase 2 Staffing Assessment Revalidation

The following task implementation timeline has been revised to show the change in tasks for Fire Brigade 1 and 2 (FB1 and FB2) for performing the DA venting actions as well as optional tasks for Plant Operator 2 in each Unit (U1 PO2 and U2 PO2) to assist with the alternate AFWST fill strategy. FB1 and FB2 were previously listed as performing support functions (as needed) in the Isolation Valve Cubicle (IVC) – this action was also being performed by maintenance personnel at the same time. In this revised timeline, FB1 and FB2 are instead sent to the roof of the Turbine Generator Building (TGB) to perform the DA venting actions and then remain in the TGB and continue performing their previously assigned tasks. As shown in this revised timeline, U1 PO2 and U2 PO2 could start installing hoses to support filling the AFWST from the DA eight hours into the event, if necessary, but additional personnel arriving on site will also be available by that time.

<u>Unit</u>	<u>Position</u>	<u>Time (hrs)</u>	<u>Task</u>	<u>Collateral Duty?</u>
On-shift Staff				
1	Shift Manager (U1 SM)	1. 0.0-0.5 2. 0.5-1.0 3. 1.0-6.0	1. Assume duties of Emergency Director. Classify event as Site Area Emergency. Block open Control Room door to kitchen. 2. Upgrade event to General Emergency. Make Protective Action Recommendations (PARs). 3. Contact National SAFER Response Center (NSRC). Continue executing the duties of Emergency Director until relieved by augmented ERO.	No
2	Shift Manager (U2 SM)	1. 0.0-6.0	1. Assess Unit 2 status. Assist Unit Supervisor as needed. Communicate with Unit 1 as required.	No
1	Unit Supervisor (U1 US)	1. 0.0-6.0	1. Direct and supervise performance of Emergency Operating Procedures (EOPs) and Fukushima Support Guidelines (FSGs) in Unit 1.	No
2	Unit Supervisor (U2 US)	1. 0.0-6.0	1. Direct and supervise performance of Emergency Operating Procedures (EOPs) and Fukushima Support Guidelines (FSGs) in Unit 2.	No
1	Reactor Operator 1 (U1 RO1)	1. 0.0-0.5 2. 0.5-1.0 3. 1.0-3.0 4. 3.0-6.0 5. 7.5-8.0	Perform 0POP05-EO-EC00 (Reference 1) and FSG actions as directed throughout event including the following : 1. Perform post-trip immediate actions. Dispatch U1 Plant Operator (PO) to strip sequencers. 2. Monitor primary system parameters. Establish hand switch lineup. 3. Support plant cooldown. Monitor primary system parameters. 4. Stabilize plant at 405 psig secondary pressure. 5. Isolate accumulators.	No

<u>Unit</u>	<u>Position</u>	<u>Time (hrs)</u>	<u>Task</u>	<u>Collateral Duty?</u>
2	Reactor Operator 1 (U2 RO1)	1. 0.0-0.5 2. 0.5-1.0 3. 1.0-3.0 4. 3.0-6.0 5. 7.5-8.0	Perform 0POP05-EO-EC00 and FSG actions as directed throughout event including the following: 1. Perform post-trip immediate actions; Dispatch PO to strip sequencers 2. Monitor primary system parameters; Establish hand switch lineup 3. Support plant cooldown; Monitor primary system parameters 4. Stabilize plant at 405 psig secondary pressure 5. Isolate accumulators	No
1	Reactor Operator 2 (U1 RO2)	1. 0.0-0.5 2. 0.0-1.0 3. 0.5-1.0 4. 3.0-6.0	Perform 0POP05-EO-EC00 and FSG actions as directed throughout event including the following: 1. Dispatch PO to restore steam generator (SG) Power-Operated Relief Valve (PORV) control to the Control Room; Dispatch PO to cross-connect SGs 2. Establish SG PORV pressure control 3. Commence plant cooldown to 405 psig secondary pressure 4. Stabilize plant at 405 psig secondary pressure	No
2	Reactor Operator 2 (U2 RO2)	1. 0.0-0.5 2. 0.0-1.0 3. 0.5-1.0 4. 3.0-6.0	Perform 0POP05-EO-EC00 and FSG actions as directed throughout event including the following: 1. Dispatch PO to restore SG PORV control to the Control Room; Dispatch PO to cross-connect SGs 2. Establish SG PORV pressure control 3. Commence plant cooldown to 405 psig secondary pressure 4. Stabilize plant at 405 psig secondary pressure	No
1	Plant Operator 1 (U1 PO1) ¹	1. 0.0-0.5 2. 0.5-2.0 3. 2.0-3.0 4. 3.0-4.0 5. 4.0-4.5 6. 4.5-5.0 7. 5.0-5.5 8. 5.5-6.0 9. 7.0-7.5	1. Transfer station blackout (SBO) switches; Perform load shedding per site emergency procedure 0POP05-EO-EC00 2. Perform deep load shedding per FSG-04 (Reference 2) 3. Continue performing actions in FSG-04 and support Isolation Valve Cubicle (IVC) operations as necessary 4. Perform electrical lineup and start FLEX diesel generator (DG) 5. Load initial FLEX power to lighting panels onto FLEX DG as power becomes available 6. Energize A-Train battery charger and exhaust fan 7. Energize C-Train battery charger and exhaust fan 8. Load communications equipment onto FLEX DG if available 9. Align breakers for accumulator isolation	No

¹ Typically Electrical Auxiliary Building (EAB) watch Operator

<u>Unit</u>	<u>Position</u>	<u>Time (hrs)</u>	<u>Task</u>	<u>Collateral Duty?</u>
2	Plant Operator 1 (U2 PO1) ¹	1. 0.0-0.5 2. 0.5-2.0 3. 2.0-3.0 4. 3.0-4.0 5. 4.0-4.5 6. 4.5-5.0 7. 5.0-5.5 8. 5.5-6.0 9. 7.0-7.5	1. Transfer SBO switches. Perform load shedding per site emergency procedure 0POP05-EO-EC00 2. Perform deep load shedding per FSG-04 3. Continue performing actions in FSG-04 and support IVC operations as necessary 4. Perform electrical lineup and start FLEX DG 5. Load initial FLEX power to lighting panels onto FLEX DG as power becomes available 6. Energize A-Train battery charger and exhaust fan 7. Energize C-Train battery charger and exhaust fan 8. Load communications equipment onto FLEX DG, if available 9. Align breakers for accumulator isolation	No
1	Plant Operator 2 (U1 PO2) ²	1. 0.0-0.5 2. 0.5-1.5 3. 1.5-2.5 4. 2.5-4.0 5. 4.0-4.5 6. 4.5-7.0 7. 7.0-8.0 8. 8.0-9.0	1. Cross-connect Auxiliary Feedwater (AFW) in Unit 1 IVC 2. Align RWST and Volume Control Tank (VCT) charging and Reactor Coolant Pump (RCP) seal valves and verify spent fuel pool (SFP) level and temperature 3. Perform Addendum 17 of FSG-05 (Reference 3) to support FLEX cable installation 4. Perform valve lineup for PDP from FSG-05, Addendums 5 and 6 5. Start and control Chemical and Volume Control System (CVCS) Positive Displacement Pump (PDP) 6. Support IVC operations as necessary 7. Support Maintenance installing hoses and swapping spectacle flange for Reactor Coolant System (RCS) Makeup 8. Assist with hose installation to support AWFST fill from the DA (if needed in the event of on-site flooding)	No
2	Plant Operator 2 (U2 PO2) ²	1. 0.0-0.5 2. 0.5-1.5 3. 1.5-2.5 4. 2.5-4.0 5. 4.0-4.5 6. 4.5-7.0 7. 7.0-8.0 8. 8.0-9.0	1. Cross-connect AFW in IVC 2. Align RWST/VCT charging and RCP seal valves and verify SFP level and temperature 3. Perform Addendum 17 of FSG-05 to support FLEX cable installation 4. Perform valve lineup for PDP from FSG-05, Addendums 5 and 6 5. Start and control CVCS PDP 6. Support IVC operations as necessary 7. Support Maintenance installing hoses and swapping spectacle flange for RCS Makeup 8. Assist with hose installation to support AWFST fill from the DA (if needed in the event of on-site flooding)	No

² Typically Mechanical Auxiliary Building (MAB) watch Operator

<u>Unit</u>	<u>Position</u>	<u>Time (hrs)</u>	<u>Task</u>	<u>Collateral Duty?</u>
1	State and County Communicator (XO1) ³	1. 0.0-1.0 2. 1.0-1.5 3. 1.5-2.0 4. 2.5-3.0 5. 3.0-3.5 6. 3.5-4.0 7. 4.5-5.0 8. 5.5-6.0 9. 6.0-7.0	1. Perform state and county notifications 2. Assist in performing deep load shedding for Unit 1 per FSG-04 3. Perform state and county follow-up notifications 4. Perform state and county follow-up notifications 5. Transfer satellite telephone to Unit 1 Control Room per FSG-05 6. Perform state and county follow-up notifications 7. Perform state and county follow-up notifications 8. Perform state and county follow-up notifications 9. Turn over Communicator duties to augmented ERO	No
-	NRC Communicator (XO2) ⁴	1. 0.0-0.5 2. 0.5-6.0	1. Perform ERO callout and Emergency Notification System (ENS) communications 2. Perform ENS communications	No
1	Maintenance 1 (M1) ⁵	1. 0.0-0.5 2. 0.5-2.0 3. 2.0-3.0 4. 3.0-4.0 5. 4.0-5.0 6. 5.0-6.0 7. 6.0-7.0	1. Perform setup of the Unit 1 Operations Support Center (OSC) 2. Assist Operator in Unit 1 IVC 3. Connect cables to Unit 1 MCC E1A2 per FSG-05 4. Connect cables to Unit 1 MCC E1C2 per FSG-05 5. Connect cables to Unit 1 MCC E1A4 per FSG-05 6. Connect cables to Unit 1 MCC E1B4 per FSG-05 7. Connect cables to Unit 1 MCC E1C4 per FSG-05	No
2	Maintenance 2 (M2) ⁵	1. 0.0-0.5 2. 0.5-2.0 3. 2.0-3.0 4. 3.0-4.0 5. 4.0-5.0 6. 5.0-6.0 7. 6.0-7.0	1. Perform setup of the Unit 2 OSC 2. Assist Operator in Unit 2 IVC 3. Connect cables to Unit 2 MCC E2A2 per FSG-05 4. Connect cables to Unit 2 MCC E2C2 per FSG-05 5. Connect cables to Unit 2 MCC E2A4 per FSG-05 6. Connect cables to Unit 2 MCC E2B4 per FSG-05 7. Connect cables to Unit 2 MCC E2C4 per FSG-05	No
1	Maintenance 3 (M3) ⁶	1. 1.0-2.0 2. 2.0-7.0 3. 7.0-8.0	1. Connect SG Makeup pump hoses per FSG-05 (in Unit 1) 2. Assist in connecting MCC cables 3. Connect hoses and swap spectacle blind for RCS Makeup per FSG-05	No
2	Maintenance 4 (M4) ⁶	1. 1.0-2.0 2. 2.0-7.0 3. 7.0-8.0	1. Connect SG Makeup pump hoses per FSG-05 (in Unit 2) 2. Assist in connecting MCC cables 3. Connect hoses and swap spectacle blind for RCS Makeup per FSG-05	No

³ Plant Operator in either unit

⁴ Reactor Operator

⁵ These tasks can be performed by a mechanic, electrician, or I&C technician

⁶ These tasks can be performed by a mechanic, electrician, or I&C technician

<u>Unit</u>	<u>Position</u>	<u>Time (hrs)</u>	<u>Task</u>	<u>Collateral Duty?</u>
1	Senior Radiation Protection Technician (SRPT)	1. 0.0-6.0	1. Assume duties of Acting Radiological Manager in Unit 1 Control Room	No
1	Radiation Protection Technician 1 (RPT1)	1. 0.0-0.5 2. 0.5-6.0	1. Support opening/blocking doors to access Control Room 2. Provide access control for Unit 1 MAB and job coverage for operators or maintenance as needed	No
2	Radiation Protection Technician 2 (RPT2)	1. 0.0-0.5 2. 0.5-6.0	1. Support opening/blocking doors to access Control Room 2. Provide access control for Unit 2 MAB and job coverage for operators or maintenance as needed	No
-	Chemistry Technician (CT1)	1. 0.0-1.0 2. 1.0-6.0	1. Secure secondary sample panel valve lineups 2. Perform site surveys.	No
1	Fire Brigade 1 (FB1) ⁷	1. 0.0-1.0 2. 1.0-3.0 3. 3.0-4.5 4. 4.5-6.0 5. 6.5-7.5 6. 8.0-9.0 7. 9.0-9.5	1. Check and attempt local start of Unit 1 Emergency DGs and Technical Support Center (TSC) DG, fail closed the Main Steam Isolation Valves (MSIVs) per FSG-04 2. Open DA vent valve to support gravity feed to AFWST; Depressurize Main Generator if required and assess plant conditions per FSG-05 3. Provide IVC support including aligning valves for using FLEX SG makeup pump 4. Prepare for fill of FLEX DG Fuel Oil Storage Tank (FOST) per FSG-19 (Reference 4) 5. Fill Unit 1 FLEX DG FOST. 6. Start Unit 1 FLEX SG makeup pump per FSG-03 (Reference 5) 7. Secure Unit 1 Turbine-Driven AFW (TDAFW) pump per FSG-09 (Reference 6)	No
2	Fire Brigade 2 (FB2)	1. 0.0-1.0 2. 1.5-3.0 3. 3.0-4.5 4. 4.5-6.0 5. 6.5-7.5 6. 8.0-9.0 7. 9.0-9.5	1. Check and attempt local start of Unit 2 Emergency DGs and TSC DG, fail closed the MSIVs per FSG-04 2. Open DA vent valve to support gravity feed to AFWST; Depressurize Main Generator if required and assess plant conditions per FSG-05 3. Provide IVC support including aligning valves for using FLEX SG makeup pump 4. Prepare for fill of FLEX DG FOST per FSG-19 5. Fill Unit 2 FLEX DG FOST 6. Start Unit 2 FLEX SG makeup pump per FSG-03 7. Secure Unit 2 TDAFW pump per FSG-09	No

⁷ Typically Turbine Generator Building (TGB) watch Operator

<u>Unit</u>	<u>Position</u>	<u>Time (hrs)</u>	<u>Task</u>	<u>Collateral Duty?</u>
1	Fire Brigade 3 (FB3) ⁸	1. 0.0-1.0 2. 1.0-1.5 3. 1.5-2.5 4. 2.5-3.5 5. 3.5-4.0 6. 4.5-6.0 7. 6.0-6.5 8. 6.5-7.5 9. > 7.5	1. Perform AFW cross-connect lineup for Unit 1 2. Perform Unit 1 breaker alignments in preparation for Addendum 17 of FSG-05 3. Assist maintenance personnel in connecting hoses for Unit 1 SG makeup pump per FSG-05. 4. Perform Unit 1 MCC load shedding per FSG-05 5. Perform initial Unit 1 battery charger breaker alignments per FSG-04 6. Prepare for fill of FLEX DG FOST per FSG-19 7. Move portable radios and chargers from OSC break room to Unit 1 Control Room per FSG-05. 8. Fill Unit 1 FLEX DG FOST per FSG-19 9. Continue filling Unit 1 FLEX DG FOST per FSG-19 every 6 hours	No
2	Fire Brigade 4 (FB4)	1. 0.0-1.0 2. 1.0-1.5 3. 1.5-2.5 4. 2.5-3.5 5. 3.5-4.0 6. 4.5-6.0 7. 6.0-6.5 8. 6.5-7.5 9. > 7.5	1. Perform AFW cross-connect lineup for Unit 2 2. Perform Unit 2 breaker alignments in preparation for Addendum 17 of FSG-05 3. Assist maintenance personnel in connecting hoses for Unit 2 SG makeup pump per FSG-05 4. Perform Unit 2 MCC load shedding per FSG-05 5. Perform initial Unit 2 battery charger breaker alignments per FSG-04. 6. Prepare for fill of FLEX DG FOST per FSG-19 7. Move portable radios and chargers from OSC break room to Unit 2 Control Room per FSG-05 8. Fill Unit 2 FLEX DG FOST per FSG-19 9. Continue filling Unit 2 FLEX DG FOST per FSG-19 every 6 hours	No
2	Fire Brigade 5 (FB5)	1. 0.0-1.0 2. 1.0-1.5 3. 1.5-3.0 4. 3.0-3.5 5. > 3.0	1. Assist maintenance personnel and plant operators and perform other activities as directed by the Unit Supervisor or reactor operators 2. Assist in performing deep load shedding for Unit 2 per FSG-04 3. Assist maintenance personnel and plant operators and perform other activities as directed by the Unit Supervisor or reactor operators 4. Transfer satellite telephone to Unit 2 Control Room per FSG-05 5. Assist maintenance personnel and plant operators and perform other activities as directed by the Unit Supervisor or reactor operators	No

⁸ Typically Yard Watch Operator

Augmented ERO				
-	Maintenance 5 (M5) ⁹	1. > 6.0	1. Trailer mounted pumps and hose trailer activities.	N/A
-	Maintenance 6 (M6) ⁹	1. > 6.0-24.0 2. > 24.0	1. Trailer mounted pumps and hose trailer activities 2. Connect NSRC generators to Engineered Safety Feature (ESF) buses.	N/A
1	Radiation Protection Technician 3 (RPT3)	1. > 6.0	1. Provide job coverage for Unit 1 FLEX makeup pump hose team	N/A
2	Radiation Protection Technician 4 (RPT4)	1. > 6.0	1. Provide job coverage for Unit 2 FLEX makeup pump hose team	N/A
-	Radiation Protection Technician 5 (RPT5)	1. > 6.0	1. Conduct offsite and onsite surveys, provide job coverage	N/A
-	Radiation Protection Technician 6 (RPT6)	1. > 6.0	1. Conduct offsite and onsite surveys, provide job coverage	N/A

Note: see Enclosure 2 which supplements the information in this timeline.

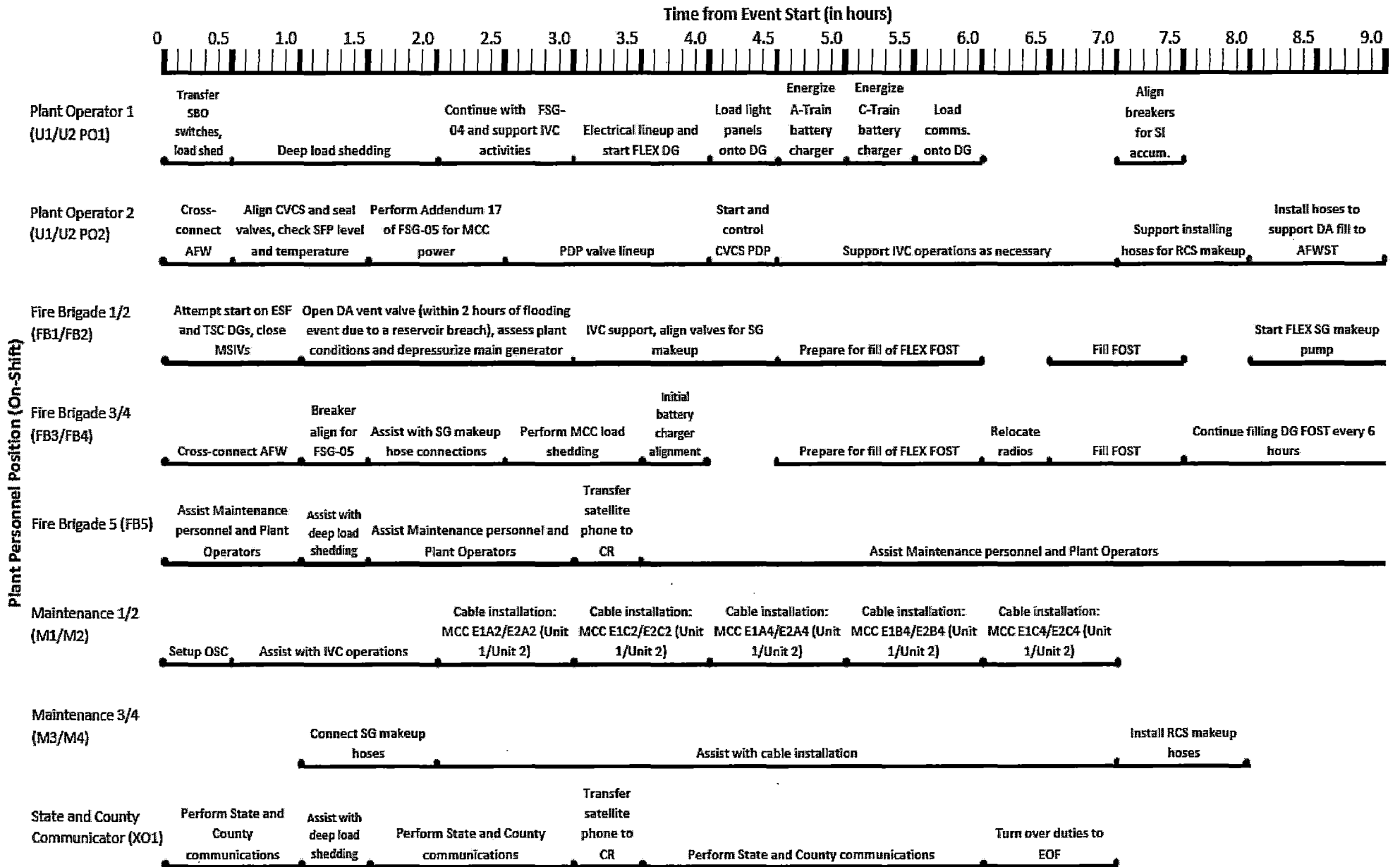
References

1. STPNOC Procedure, 0POP05-EO-EC00, "Loss of All AC Power" (STI 34264231)
2. STPNOC Fukushima Support Guideline, 0POP12-ZO-FSG04, "ELAP DC Bus Load Shed / Management" (STI 34237578)
3. STPNOC Fukushima Support Guideline, 0POP12-ZO-FSG05, "Initial Assessment and FLEX Equipment Staging" (STI 34236725)
4. STPNOC Fukushima Support Guideline, 0POP12-ZO-FSG019, "480V FLEX Diesel Generator Operation" (STI 34237393)
5. STPNOC Fukushima Support Guideline, 0POP12-ZO-FSG03, "Alternate Low Pressure Feedwater" (STI 34236715)
6. STPNOC Fukushima Support Guideline, 0POP12-ZO-FSG09, "Low Decay Heat Temperature Control" (STI 34237571)

⁹ Task can be performed by the maintenance personnel onsite as part of the IMT or by maintenance staff arriving onsite with the augmenting ERO

Enclosure 2

Revised Timeline of Key Plant Operator and Maintenance Activities



Enclosure 3
Status of Commitments

Status of Commitments

The following table identifies the status of the actions to which STPNOC had previously committed. No new commitments have been added as a result of this supplement letter.

Commitments	Scheduled Due Date	Condition Report
Procedures and/or training programs will be revised to ensure that Chemistry Technicians retain the ability to perform on-site surveys. Action will be completed prior to the end of 2RE17.	<i>Completed April 30, 2015</i>	12-11657-36
Revise Section 5.4.1.2 of IMT-0001, "Integrated Maintenance Team Guideline" to note that the minimum staffing listed in this section must be maintained in order to implement FLEX strategies	<i>Completed September 3, 2015</i>	12-11658-584