



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

January 19, 2017
NOC-AE-17003434
10 CFR 50.90

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
Revised Applicability Matrix for Response to
Request for Additional Information Questions STSB 1 and 2
Regarding STP Risk-Informed GSI-191 Licensing Application (TAC Nos MF2400 and MF2401)

Reference:

Letter; J. Connolly to USNRC Document Control Desk; "Applicability of Application Supplement 1 Correspondence to Supplement 2 to STP Risk-Informed GSI-191 Licensing Application"; June 9, 2016; (NOC-AE-16003369) (ML16176A148).

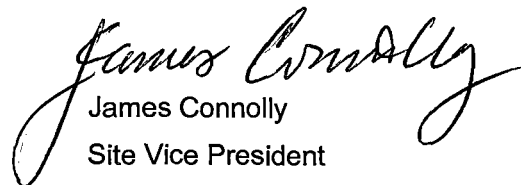
In the above Reference, STP Nuclear Operating Company (STPNOC) provided information regarding request for additional information (RAI) responses that are no longer relevant to the STPNOC Risk-Informed GSI-191 application. Specifically, in Table 1 of Attachment 2 to the above Reference, STPNOC provided information related to the applicability of RAI Questions STSB 1 and 2 regarding use of Risk Managed Technical Specifications (RMTS). A revised applicability basis for this item is provided in the Enclosure to this letter.

There are no commitments in this letter.

If there are any questions or if additional information is needed, please contact Drew Richards at (361) 972-7666 or me at (361) 972-7344.

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

Executed on January 19, 2017


James Connolly
Site Vice President

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Enclosure: Revised Applicability Matrix for RAI Questions STSB 1 and 2

ADD
NRR

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ENCLOSURE

Revised Applicability Matrix for RAI Questions STSB 1 and 2

The response in the original Applicability Letter (ML16176A148) stated that although the description of the application of RMTS is correct in the RAI responses, the RMTS RAIs are not applicable because RMTS is not required for the proposed 90-day completion time. STPNOC subsequently determined that there are circumstances where RMTS may apply in conjunction with the 90-day completion time of the proposed debris-specific TS and changed the applicability assessment to "Applicable".

Applicability and Letter Reference for Response	RAI	Applicability Basis	Comments
<p>Applicable</p> <p>ML14149A434</p>	<p>STSB: Questions 1 and 2</p>	<p>The description of the application of RMTS in RAI responses is correct, but clarification would enhance understanding regarding how the application is affected by the proposed 90-day debris-specific TS action.</p> <p>The proposed 90-day debris-specific TS action added to the ECCS and CS TS applies only to the effects of LOCA-generated debris. Because the 90-day required completion time exceeds the 30-day maximum allowed risk-informed completion time (RICT) for RMTS, use of RMTS for this action is not necessary and is not part of the action. However, if a condition unrelated to debris arises where a train of ECCS or CS is declared inoperable while the debris-specific action is being applied, the non-debris ECCS or CS TS Action (a) or Action (b) must also be applied. ECCS and CS TS Actions (a) and (b) permit the application of RMTS and calculation of a RICT. The RICT must include the risk contribution from the debris issue and is limited to a maximum completion time of 30 days. Action c for the debris still applies from the time it was entered and may not be extended by the RICT.</p>	