



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

August 19, 2021
NOC-AE-21003822
10 CFR 71.106

ATTN: Document Control Desk
Director, Division of Spent Fuel Management Office
of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Report of Changes Made to Quality Assurance Program for Radioactive Material Packages


Reference: Letter; P. Silva (USNRC) to D. L. Koehl; "Revised Quality Assurance Program Approval Form for Radioactive Material Packages No. 0645, Revision 5;" dated August 28, 2015 (ML15245A285).

In accordance with 10CFR 71.1(a), 10CFR 71.106(b), and the above referenced letter, STP Nuclear Operating Company (STPNOC) hereby submits a report of changes to the STPNOC Quality Assurance (QA) Program for Radioactive Material Packages (No. 0654, Revision 5) approved on August 28, 2015. The changes to the STPNOC QA Program for Radioactive Material Packages are documented in STPNOC procedure OPGP03-ZR-0053, "Radioactive Material Control Program," Revision 21, effective June 30, 2021.

Attached is a summary of the changes to the subject procedure made since August 7, 2019. The attachment documents that the changes are non-substantive in nature, involving administrative items and editorial type clarifications. The changes do not reduce commitments in the STPNOC QA Program for Radioactive Material Packages.

There are no commitments in this letter.

If there are any questions regarding this matter, please contact Ali Albaaj at (361) 972-8949 or me at (361) 972-8168.


Clayton B. Stone
Manager, Health Physics

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Attachment: Summary of Changes Made to the South Texas Project Nuclear Operating Company Quality Assurance Program for Radioactive Material Packages Since August 7, 2019

cc:

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Attachment

**Summary of Changes Made to the South Texas Project Nuclear Operating Company
Quality Assurance Program for Radioactive Material Packages Since August 7, 2019**

Changes to 0PGP03-ZR-0053, Rev. 21 (Effective June 30, 2021)		
Step Changed	Description of Changes	Regulatory Basis
Table of Contents	Removed Section 7.5 "Removal of Material from Radiologically Controlled Areas" References to "0PRP04-ZR-0004, Release of Materials from Radiologically Controlled Areas" is now provided for guidance related to these activities.	10CFR71.106(b): Administrative improvement
Step 1.8	Removed hyphen from "by-product material" for consistency within the procedure.	10CFR71.106(b): Spelling correction
Step 2.15	Corrected Title to read "Radiological Postings and Warning Devices"	10CFR71.106(b): Administrative improvement
Inserted Caution Box prior to Step 4.12	Revisions to this program are required to be reviewed in accordance with 10 CFR 71.106. Changes to the program may be made provided the change does not reduce the commitments in the program previously accepted by the NRC. Changes to the program that do reduce the commitments must be submitted to the NRC for review and approval prior to implementation.	10CFR71.106(b): Administrative improvement
Add step 4.12.1	<u>IF</u> a change is desired to the program, <u>THEN</u> perform a review per the criteria in 10 CFR 71.106	10CFR71.106(b): Administrative improvement
Add step 4.12.2	<u>IF</u> it is determined the change does not reduce the quality program commitments previously accepted by the NRC, <u>THEN</u> NRC approval is not required prior to implementation.	10CFR71.106(b): Administrative improvement
Add step 4.12.3	<u>IF</u> the change reduces quality program commitments previously accepted by the NRC, <u>THEN</u> obtain NRC approval prior to implementation.	10CFR71.106(b): Administrative improvement
Add step 4.12.4	<u>IF</u> NRC approval is required prior to implementation, <u>THEN</u>	10CFR71.106(b): Administrative improvement

Changes to OPGP03-ZR-0053, Rev. 21 (Effective June 30, 2021)		
Step Changed	Description of Changes	Regulatory Basis
Add step 4.12.4.1	Provide written justification for the change to allow Licensing to request prior approval from the NRC	10CFR71.106(b): Administrative improvement
Add step 4.12.4.2	Add an action to the CR tracking the change to verify that NRC approval is obtained	10CFR71.106(b): Administrative improvement
Note below 7.4	Corrected reference to the title for OPRP04-ZR-0015 "Radiological Postings and Warning Devices"	10CFR71.106(b): Administrative improvement
Deleted Step 7.5	Release of Materials from Radiologically Controlled Areas	10CFR71.106(b): Administrative improvement
Deleted Step 7.5.1	Waste materials unconditionally released from the Radiologically Controlled Area SHALL be disposed of in accordance with OPGP03-ZH-0003 (Packaging of non-Radioactive Waste Materials for Disposal).	10CFR71.106(b): Administrative improvement
Step 7.5.3	Corrected the reference which should be 7.5.1.	10CFR71.106(b): Administrative improvement
Addendum 2	Removed Addendum 2, Examples of RAM Labels/Tags. Addendum 2 is not referenced in the body of the procedure and the procedure directs to OPRP04-ZR-0015.	10CFR71.106(b): Administrative improvement