

From: Galvin, Dennis
Sent: Monday, November 1, 2021 4:03 PM
To: Wendy Brost (webrost@stpegs.com)
Cc: Dibbern, Zachary
Subject: South Texas Project – Acceptance of Requested Licensing Action - Inservice Inspection Impracticality (EPID: L 2021-LLR-0075)

Ms. Brost,

By letter dated September 23, 2021 (Agencywide Documents Access and Management System Accession No. ML21089A301), STP Nuclear Operating Company (STPNOC, the licensee) submitted a relief request for the third ten-year inspection interval from American Society of Mechanical Engineers (ASME) Section XI requirements for weld examination on the basis of impracticality for South Texas Project (STP) Units 1 and 2.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's acceptance review of these proposed relief requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether any submittal has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Section 50.55a(g)(5)(iii) of Title 10 of the Code of Federal Regulations (10 CFR), the licensee shall submit information to support the determination that conformance with a Code requirement is impractical for its facility. The determination of impracticality in accordance with 10 CFR 50.55a(g)(5)(iii) must be based on the demonstrated limitations experienced when attempting to comply with the Code requirements during the inservice inspection interval for which the request is being submitted.

The NRC staff has reviewed your submittal and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed relief request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, there may be instances in which issues that impact the staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 200 hours each to complete. The NRC staff expects to complete this review by November 1, 2022. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the applications and they could change, due to several factors including requests for additional information, and unanticipated

addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

Please contact me with any questions.

Respectfully,

Dennis Galvin
Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Licensing Project Branch 4
301-415-6256

Docket No. 50-498 and 50-499

Hearing Identifier: NRR_DRMA
Email Number: 1401

Mail Envelope Properties (SA1PR09MB81113E74175BFE8B47793500FB8A9)

Subject: South Texas Project – Acceptance of Requested Licensing Action - Inservice Inspection Impracticality (EPID: L 2021-LLR-0075)
Sent Date: 11/1/2021 4:03:05 PM
Received Date: 11/1/2021 4:03:00 PM
From: Galvin, Dennis

Created By: Dennis.Galvin@nrc.gov

Recipients:
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Tracking Status: None

Post Office: SA1PR09MB8111.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3552	11/1/2021 4:03:00 PM

Options
Priority: Normal
Return Notification: No
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Sensitivity: Normal
Expiration Date: