



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

January 21, 2025

EA-24-117

Kimberly A. Harshaw, Acting President
and CEO and CNO
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

**SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION, UNITS 1
AND 2 – FINAL SIGNIFICANCE DETERMINATION OF A WHITE FINDING,
NOTICE OF VIOLATION, AND FOLLOW-UP ASSESSMENT LETTER; NRC
INSPECTION REPORT 05000498/2025090 AND 05000499/2025090**

Dear Kimberly A. Harshaw:

This letter provides you the final significance determination of the preliminary White finding discussed in our previous communication dated November 21, 2024, which included U.S. Nuclear Regulatory Commission (NRC) Inspection Report 05000498/2024050 and 05000499/2024050, Agencywide Documents Access and Management System (ADAMS) Accession No. ML24320A137. The finding involved the failure to establish adequate preventive maintenance instructions with relevant vendor recommendations pertaining to the calibration of protective relays and the maintenance of hand switch auxiliary contacts.

In a letter dated December 19, 2024 (ML24355A074), you provided a response to the NRC staff preliminary determination regarding the finding. Your response communicated the cause of the finding and your completed and planned corrective actions.

After considering the information developed during the inspection and in your response dated December 19, 2024, the NRC has concluded that the finding is appropriately characterized as White, a finding of low to moderate safety significance.

You have 30 calendar days from the date of this letter to appeal the NRC's determination of significance for the identified White finding. Such appeals will be considered to have merit only if they meet the criteria given in Inspection Manual Chapter 0609, Attachment 2 (ML24156A064). An appeal must be sent in writing to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, and emailed to R4Enforcement@nrc.gov.

The NRC has also determined that the failure to implement adequate preventive maintenance procedures, such that the Unit 2 load center E2A1 hand switch HS-0001 remained capable of performing its intended function, is a violation of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.65(a)(2), as cited in the enclosed Notice of Violation (Notice). The circumstances surrounding the violation were described in detail in Inspection Report 05000498/2024050 and 05000499/2024050. In accordance with the NRC Enforcement Policy, the Notice is considered an escalated enforcement action because it is associated with a White finding.

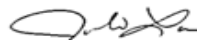
The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be achieved is already adequately addressed on the docket in Inspection Report 05000498/2024050 and 05000499/2024050 and in your letter dated December 19, 2024. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

As a result of our review of South Texas Project's performance, including this White finding, we have assessed the performance of South Texas Project, Unit 2, to be in the Regulatory Response column of the NRC's Action Matrix, effective the fourth quarter of 2024. Therefore, we plan to conduct a supplemental inspection using Inspection Procedure 95001, "Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs," when your staff has notified us of your readiness for this inspection. This inspection procedure is conducted to provide assurance that the root cause and contributing causes of risk significant performance issues are understood, the extent of condition and the extent of cause are identified, and the corrective actions are sufficient to prevent recurrence.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, the enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's ADAMS, accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If you have any questions concerning this matter, please contact Patricia Vossmar of my staff at 817-200-1144.

Sincerely,



Signed by Lara, Julio
on 01/21/25

Julio F. Lara
Deputy Regional Administrator

Docket Nos. 05000498 and 05000499
License Nos. NPF-76 and NPF-80

Enclosure:
Notice of Violation

cc w/ encl: Distribution via LISTSERV

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION, UNITS 1 AND 2 – FINAL SIGNIFICANCE DETERMINATION OF A WHITE FINDING, NOTICE OF VIOLATION, AND FOLLOW-UP ASSESSMENT LETTER; NRC INSPECTION REPORT 05000498/2025090 AND 05000499/2025090 – DATED JANUARY 21, 2025

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ADAMS ACCESSION NUMBER: **ML25007A210**

SUNSI Review: ADAMS: Non-Publicly Available Non-Sensitive Keyword:
 By: ACR Yes No Publicly Available Sensitive

OFFICE	ES:ACES	TL:ACES	RC	C:PBA	OE
NAME	ARoberts	BAlferink	DCylkowski	PVossmar	DJones
SIGNATURE	/RA/ E	/RA/ E	/RA/ E	/RA/ E	/RA/ E
DATE	01/06/25	01/08/25	01/08/25	01/08/25	01/10/25
OFFICE	D:DORS	DRA			
NAME	GMiller	JLara			
SIGNATURE	/RA/ E	/RA/ E			
DATE	01/13/25	01/21/25			

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

STP Nuclear Operating Company
South Texas Project Electric Generating Station

Docket No. 05000499
License No. NFP-80
EA-24-117

During an NRC inspection conducted from September 9-12, 2024, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 50.65(a)(1), requires, in part, that the holders of an operating license shall monitor the performance or condition of structures, systems, or components (SSC) within the scope of the rule, against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs, as defined by 10 CFR 50.65(b), are capable of fulfilling their intended functions.

10 CFR 50.65(a)(2) states, in part, that monitoring as specified in 10 CFR 50.65(a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended function.

Contrary to the above, as of May 12, 2024, the licensee failed to demonstrate that the performance of an SSC, Unit 2 load center E2A1 breaker, had been effectively controlled through the performance of appropriate preventive maintenance such that the SSC remained capable of performing its intended function. Specifically, the licensee failed to implement adequate preventive maintenance procedures such that the load center E2A1 hand switch HS-0001 remained capable of performing its intended function by not preventing a close signal from reaching the breaker.

This violation is associated with a White significance determination process finding.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be achieved is already adequately addressed on the docket in Inspection Report 05000498/2024050 and 05000499/2024050 and in your letter dated December 19, 2024.

However, if the description therein does not accurately reflect your position or your corrective actions, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 within 30 days of the date of the letter transmitting this Notice of Violation. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation; EA-24-177," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, the NRC Resident Inspector at the South Texas Project, and email it to R4Enforcement@nrc.gov.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Enclosure

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

Dated this 21st day of January 2025