Nuclear Operating Company

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

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

January 15, 2001
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South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Revised Request for Exemption to Exclude Certain Components
From The Scope of Special Treatment Requirements Required by Regulations

Reference 1: Draft Safety Evaluation on Exemption Requests from Special Treatment Requirements of 10CFR Parts 21, 50, and 100 (TAC Nos. MA6057 and MA6058), dated November 15, 2000

In Reference 1, the Nuclear Regulatory Commission (NRC) responded to the STP Nuclear Operating Company's (STPNOC) request for an exemption from various special treatment requirements found in the regulations. The NRC response, via a Draft Safety Evaluation Report, included sixteen Open Items and two Confirmatory Items in the body of the response. STPNOC has evaluated these Open Items and Confirmatory Items and has enclosed responses to five of the Open Items. The five enclosed responses are attached, and include replies to Open Item 3.1, Open Item 3.2, Open Item 3.3, Open Item 3.6, and Open Item 13.1.

STPNOC anticipates forwarding the remainder of the Open Item and Confirmatory Item responses to the NRC by January 26, 2001.

- Attachment 1 Open Item 3.1
- Attachment 2 Open Item 3.2
- Attachment 3 Open Item 3.3
- Attachment 4 Open Item 3.6
- Attachment 5 Open Item 13.1

If you have any questions, please call Mr. Glen E. Schinzel at 361-972-7854 or me at 361-972-7138.

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Attachment 1

Open item 3.1: The appropriate equation for combining the random and common cause failure modes into a single importance value needs to be addressed by STPNOC.

Response:

STPNOC believes the proposed methodology of dividing the common cause importance value into the individual elements is an innovative approach and is a more technically correct method to account for common cause within a single importance measure. However, due to issues associated with this methodology and the time necessary to gain consensus on this approach, STPNOC will revert back to the recognized conservative approach for PRA risk rankings from the GQA SER with one exception as stated below.

It has been determined that the PRA risk-ranking incorrectly adds Risk Achievement Worths (RAWs) across differing failure modes (i.e., fail to start, fail to run, etc.). Rather, the proper approach considers the RAW for a component to be equal to the highest component failure mode and not the sum of the failure modes. For example, the RAW for a pump is equal to the highest of either the 'fail to run' or 'fail to start' RAW, and is not equal to the sum of the RAW values. Therefore, STPNOC will utilize the common cause methodology as stated in the GQA SER except that the RAW for the component will be based upon the RAW of the highest failure mode.

STPNOC is currently evaluating the effect of reverting back to the GQA SER common cause methodology with the modified RAW approach. This evaluation is documented and is being tracked under STP's corrective action program as Condition Report 01-497. The corrective actions to address this condition include: revise the risk ranking analysis, and identify if any components require recategorization. STPNOC will continue to work with industry and NRC initiatives to further refine and enhance the methodology to more correctly address the common cause factor.

Attachment 2

Open item 3.2: STPNOC is required to provide the NRC with clarification on the FV criteria used in the categorization process for determining HSS SSCs.

Response:

The correct Fussell-Vesely (FV) value to be used for determining HSS SSCs is 'greater than or equal to 0.01'. The STPNOC procedure for risk ranking inadvertently states that components with a Fussell-Vesely (FV) value greater than or equal to **0.1** would be classified as HSS. This discrepancy is due to an error that was not recognized in the review process. Failure to recognize this error allowed the incorrect value to be used in the PRA risk-ranking process. The GQA SER correctly states that a component with a FV value greater than or equal to **0.01** would be ranked "high".

The discrepancy is documented and is being tracked under STP's corrective action program as Condition Report 00-17586. The corrective actions to address this condition include: revise the procedure to reflect the correct criterion of 0.01, and identify if any components were incorrectly categorized as medium instead of high due to this error. In addition, a comprehensive review of other FV and RAW threshold values was completed to ensure correctness, and no additional errors were noted.

An evaluation was completed to determine if any components were improperly categorized based on the incorrect HSS FV value in the current risk ranking procedure. Of the approximately 1200 components with PRA rankings, only two components were incorrectly PRA-ranked as "medium" instead of "high". These components are the Technical Support Center (TSC) Diesel Generator (DG) and the associated output breaker. The FV importance measures for these components are 3.23E-2 and 4.81E-2, respectively. However, neither of these components has gone through the deterministic categorization process. Therefore, no plant processes have yet been modified for these components based solely on their PRA risk ranking.

Attachment 3

Open item 3.3: STPNOC needs to incorporate the qualification criteria for members of the IDP provided in the July 19, 2000, draft review guidelines into its categorization process and a description of the qualification criteria into the proposed FSAR section.

Response:

STPNOC has revised the qualification criteria for the Expert panel and for the GQA Working Group to make them generally consistent with the NRC draft review guidelines of July 19, 2000. These revisions are reflected in the attached revised UFSAR section 13.7.2.2 and in the attached draft revision excerpts from the Comprehensive Risk Management procedure.

REVISED PROPOSED UFSAR SECTION 13.7.2.2

13.7.2.2 Comprehensive Risk Management Process. The integrated decision-making process used by STP is controlled by procedure. The integrated decision-making process incorporates the use of an Expert Panel and Working Groups. The Expert Panel is comprised of qualified senior level individuals and is responsible for oversight of the program and for reviewing the activities and recommendations of the Working Group. The Working Group is comprised of experienced individuals who apply risk insights and experience to categorize components in accordance with the process described in this Section and make recommendations to the Expert Panel.

The Expert Panel and Working Group have expertise in the areas of risk assessment, quality assurance, licensing, engineering, and operations and maintenance. The combined membership of the Expert Panel and Working Group includes at least three individuals with a minimum of five years experience at STP or similar nuclear plants, and at least one individual who has worked on the modeling and updating of the PRA for STP or similar plants for a minimum of three years.

Procedures control the composition of and processes used by the Expert Panel and Working Group. Procedures also identify training requirements for members of the Expert Panel and Working Group, including training on probabilistic risk assessment, risk ranking, and the graded quality assurance process. Finally, the procedures specify the requirements for a quorum of the Expert Panel and Working Group, meeting frequencies, the decision-making process for determining the categorization of components, the process for resolving differing opinions among the Expert Panel and Working Group, and periodic reviews of the appropriateness of the programmatic control and oversight of categorized components.

EXCERPTS FROM DRAFT REVISION TO 0PGP02-ZA-0003, COMPREHENSIVE RISK MANAGEMENT

Section 5 - Requirements

The Expert Panel is composed of a Chairman and seven additional senior level managers as designated by the President and Chief Executive Officer. The Expert Panel membership may be augmented as determined by the President and Chief Executive Officer. Any change to the Comprehensive Risk Management Expert Panel membership requires approval of the President and Chief Executive Officer.

Working Groups shall be comprised of individuals as listed on the appropriate addenda to this procedure.

Alternates are allowed only for the position of Expert Panel Chairman, Working Group Chairman, and Administrator of Risk Management. The use of alternates is to enable the functions of the Expert Panel and Working Groups to continue if the respective individuals are not on site. Alternates must be designated in advance and approved in writing by the same authority that approved the corresponding membership.

Expert Panel members, Working Group personnel, and any designated alternates shall be trained to this procedure and the following procedures/processes:

- PRA procedures referenced in Section 2.0.
- 10 CFR 50.59 (reference 2.5, familiarization training)
- Root Cause Analysis process (familiarization training)
- Defense-in-depth philosophy, as detailed below, including requirements to maintain this philosophy.
    - Reasonable balance is preserved among prevention of core damage, prevention of containment failure or bypass, and mitigation of consequences of an offsite release.
    - System redundancies, independence, and diversity are preserved commensurate with the expected frequency of challenges, consequences of failure of the system, and associated uncertainties in determining these parameters.
    - There is no over-reliance on programmatic activities and operator actions to compensate for weaknesses in the plant design, and
    - Potential for common cause failure is taken into account.

The combined membership of the Expert Panel and the GQA Working Group includes at least three individuals with a minimum of five years experience at STP or a similar nuclear plant, and at least one individual who has worked on the modeling and updating of the PRA for STP or a similar nuclear plant for a minimum of three years.

The Expert Panel identifies plant systems, activities, processes, commitments and requirements to be evaluated by the Working Groups.

Section 6 – Process

Working Groups

Working Groups are established as required to evaluate the risk significance of systems, components, and various programs identified in the addenda to this procedure.

Working Groups shall convene at frequencies as established in their respective Addenda.

Minimum quorum requirements for Working Group meetings are the chairman or alternate chairman and at least three members, unless otherwise specified in the Addendum for that Working Group.

Administrative requirements for Working Group meetings include the preparation and distribution of an agenda prior to the meeting and the recording of meeting minutes. The minutes shall indicate the members in attendance.

Using the criteria established in the addenda, the Working Groups shall analyze performance data, consider available risk information and their own deterministic insight, and shall develop recommendations.

Recommendations shall be arrived at by consensus. Dissentions shall be documented for Expert Panel resolution.

Recommendations shall be documented and shall include rationale and risk categorization/performance information that form the bases for the recommendations.

The documented recommendations shall be forwarded to the Expert Panel.

Differences in risk categorizations may arise between various Working Groups because of the use of different criteria. In such cases, the respective Working Groups shall convene together to evaluate these differences and to determine their acceptability. The Working Groups shall notify the Expert Panel of these differences and, where necessary, shall request the Expert Panel's resolution for any items that cannot be reconciled.

Following Expert Panel approval of the Working Group recommendations, any changes to these approved recommendations shall receive the same level of review by the Working Group as the original. Changes shall be forwarded to the Expert Panel Chairman and indicated as intent or non-intent changes.

Expert Panel

EXCERPTS FROM DRAFT REVISION TO 0PGP02-ZA-0003, COMPREHENSIVE RISK MANAGEMENT

The Expert Panel shall convene at frequencies necessary to evaluate recommendations from the Working Groups and to assess the overall station risk impact after each plant-specific data update of the PRA.

Minimum quorum requirements for Expert Panel meetings are the chairman or alternate chairman and at least three members, one of whom must be the Administrator of Risk and Reliability Analysis or alternate. No more than one alternate is allowed. There shall be no short-term designee representation.

Administrative requirements for Expert Panel meetings include the preparation and distribution of an agenda prior to the meeting and the recording of meeting minutes. The minutes shall indicate the members in attendance.

The Expert Panel shall use the same criteria as the Working Groups in reviewing recommendations and shall inject their own deterministic insight as appropriate. Dissenting opinions from the Working Groups shall be resolved.

Decisions shall be arrived at by consensus. Expert Panel dissenting opinions shall be documented. Any Expert Panel dissenting opinions shall be forwarded to the Senior Management Team (SMT) for resolution.

The Expert Panel shall perform the tasks defined in 4.1 of this procedure and shall document its decisions in the form of meeting minutes.

The Expert Panel Chairman shall indicate the Panel's approval of the Working Groups' documented recommendations by signing the corresponding document and authorizing its issue for plant use.

Intent changes to previously approved Working Group recommendations shall receive the same level of Expert Panel review and approval as the original. Non-intent changes need only the Expert Panel Chairman's review and approval.

The SMT shall resolve any Expert Panel dissenting opinions that require resolution.

EXCERPTS FROM DRAFT REVISION TO 0PGP02-ZA-0003, COMPREHENSIVE RISK MANAGEMENT

Addendum 1 Excerpts

GQA WORKING GROUP:

The GQA Working Group shall consist of a Chairman and members from Engineering, Quality, Risk Management, Operating Experience, Licensing, Operations, and Maintenance/Work Control. In addition, the cognizant system engineer shall participate in the Working Group discussions for that system or its components. Additional individuals may be invited to participate as subject matter experts depending on the topic under consideration. The cognizant system engineer and any invited subject matter experts are not official members of the Working Group and are not required to meet the training requirements specified in section 5.4.

The GQA Working Group members shall be senior level personnel with backgrounds that enable them to render logical recommendations. At least three members of the Working Group shall have five or more years experience at the plant. GQA Working Group membership, including the chairman, shall be endorsed by the Expert Panel.

The GQA Working Group shall meet, as a minimum, once per cycle to determine if the levels of programmatic control and oversight warrant review and/or adjustment. OEG performance reports may be included in these reviews.

The GQA Working Group shall consider SSCs in accordance with Addendum 3 and reference 2.4. They shall consider plant performance provided by the OEG, as applicable. Specific attention shall be afforded to areas of poor or declining performance, with special attention to activities which have or can have direct effect on plant systems and components. These considerations, as augmented by the group members' deterministic insights, form the bases for recommendations regarding the levels of programmatic controls to be imposed on SSCs. They also form the basis for recommending the levels of oversight (both line and independent).

Recommendations developed by the GQA Working Group shall be documented in a Risk Significance Basis Document and shall be forwarded to the Expert Panel for their approval and issuance.

Attachment 4

Open Item 3.6: STPNOC needs to finalize its process for the development and implementation of general notes in the categorization of SSCs and provide it to the NRC for review. Further issues may be developed related to this area after receipt of the finalized process.

Response:

General notes are used to provide component risk justification, where needed, for similar component types that are treated the same from system to system. Examples include handswitches, indication-only instrumentation, and vent/drain valves. Due to the large number of such components and the similarity of the justification from component to component and from system to system, reference to a general note provides an efficient and consistent method to document the appropriate justification. Components covered by a general note are not excluded from review by the GQA Working Group. These components are evaluated along with other components to ensure proper applicability of the note and appropriateness of the risk categorization. The use of general notes is simply an administrative tool that allows for increased efficiency in the documentation of justifications of large numbers of similar components. In other words, rather than repeating the same justification over and over again for similar components, reference to a general note provides a consistent and efficient method for documenting the justification

STPNOC has enhanced its process for the development and implementation of general notes used in the categorization of SSCs. Specifically, STPNOC has performed the following:

1. Enhancement of General Notes – As shown by the attached, the justifications provided to support the risk categorizations have been revised to provide a more comprehensive and technically defensible basis. In addition, the scope of the notes has been clarified in some instances. STPNOC points out that the scope of the note on 'pressure boundary' has been clarified. It was never the intent of this note to be applied to "low pressure or high volume" and the note was not applied in this manner. Rather, the use of the note was limited to "low pressure and high volume". The justification originally provided for this note attests to this approach. Thus, the note would never be applied to the Reactor Coolant System, as an example. Finally, the note on relief valves was eliminated. In cases where a general note was eliminated, the documented risk basis for each affected SSC was enhanced with clarifying detail.
2. The methodology for use of the general notes has been incorporated into a draft revision to the Graded QA Working Group procedure. The attached excerpt provides additional details.
3. The control of general notes, including development, approval, and change control, has also been included in the above procedure revision.

4. The GQA Working Group has completed a comprehensive effort to review the previous component categorizations that involved the use of general notes and to compare the categorizations to the revised notes. The purpose of the review was to ensure that, based on the revised notes, the component was within the scope of the note and that its risk categorization was consistent with that called out by the note. The risk categorization of some components was changed as a result of this review. The review process and the risk changes were presented to and approved by the Expert Panel.
5. As part of the above review and consistent with improvements in the risk significance basis document (RSBD) for risk categorizations, any component that utilizes a general note as a basis will now have that general note number referenced in the RSBD documented bases for risk categorizations.

GENERAL NOTES FOR GQA REVIEW

#	SUBJECT	SCOPE	RISK (see remarks)	BASIS
1	Vent , drain, test valves	1 inch or less in size	NRS	Normally closed and capped. Gross leakage not credible. Good reliability based on STP and industry experience. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position and ensures that the valve is capped.
2	Normally open manual valves in main flow path	Does not include throttle valves	Same as pressure boundary risk	An open valve is essentially a piece of pipe. Valve disk failure in a manner which would impede flow is not considered a credible event. These valves are locked open or locked-in-place, where additional assurance is required. Gross leakage not credible. Good reliability based on STP and industry experience. Operation of the system and the monitoring of system parameters are other indicators of proper valve status. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position and ensures that the valve is locked, if applicable.
3	Other valves not included in Notes 1 and 2 above, including instrument root valves and branch line valves	a. 1 inch or less in size b. Size of valve relative to main process piping is small	NRS for pressure boundary purposes only	Gross leakage not credible. Good reliability based on STP and industry experience. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position.
4	Snubbers		Same as pressure boundary risk	Even though the snubber is designed to protect the system during a seismic event, the more credible failure mode would be failure of a snubber to allow for thermal movement during normal operations (fail rigid). If such a failure were severe enough to cause overstressing, it would exhibit itself first through deformation of the snubber itself or to its supports. It is highly unlikely that the piping would be damaged (EPRI report TR-110381) and even if it were, it would be through plastic deformation and/or through a leak-before-break scenario. Piping leaks would become quickly evident during routine operator rounds, system engineer walkdowns, or other visual or system performance indication. The probability of such an unlikely event occurring at the same time as a safety system being demanded to support accident or transient mitigation is even more remote. Piping failure during a seismic event from a "fail free" snubber is also very unlikely due to the robustness of the ASME-designed systems (EPRI report TR-110381). Snubber is conservatively assigned the same risk as the pressure boundary risk for the portion of piping that the snubber is located on.

Remarks: 1. Unless ranked higher by the PRA.

2. When a critical attribute is provided for a component, it is understood that the critical attribute must function sufficiently enough to meet the design functional requirements associated with that attribute. For example, the attribute "Permit Flow in normal direction", as given to a check valve is understood to mean that the check valve must not only open in the normal direction of flow, but must open sufficiently enough to meet design flow requirements.
3. For a valve, the critical attribute of "pressure boundary" means ability to contain the fluid if the valve is normally open and ability to contain the fluid and isolate the line if the valve is normally closed.
4. Closed and capped 1 inch or less test valves that are part of the containment isolation boundary fall under the scope of Note 1 and are NRS.

GENERAL NOTES FOR GQA REVIEW

#	SUBJECT	SCOPE	RISK (see remarks)	BASIS
5	Instrument Indication and recorders, including supporting devices such as transmitters, etc.	a. Visual indication only. Not involved in the generation of alarms or actuation signals b. Not identified by Operations as being critical	NRS	Failure would not affect risk significant system functions. The majority of these are local indicators. Diverse indication is typically available.
6	Handswitches, Control Room	If controlled component has some risk significance, risk of switch cannot be NRS	1 Level lower than controlled component	Reliability of handswitches has been very good. Local/ASP redundant switch available. Most time sensitive operations are automatic, do not require switch manipulation, and rely only on handswitch circuit continuity for success. The probability of a circuit continuity failure in a static role is very low and is clearly less than the probability of failure for the controlled component, which must change state. Automatic safety systems are periodically tested and these tests include the automatic initiation circuitry. In addition, handswitches are manipulated on a regular basis as part of routine operations. Any failure in the handswitch or its associated electrical circuitry would manifest itself during these operations.
7	Handswitches, Transfer (between control room and local/ASP)	If controlled component has some risk significance, risk of switch cannot be NRS	2 Levels lower than controlled component	Reliability of handswitches has been very good. Preferred method is to use control room switch. Transfer switch is normally positioned for control room operations. Thus, transfer switch would not normally have to be manipulated. Only function is circuit continuity. The probability of a circuit continuity failure in a static role is very low and is clearly less than the probability of failure for the controlled component, which must change state. Automatic safety systems are periodically tested and these tests include the automatic initiation circuitry.
8	Handswitches. Local or on Aux Shutdown Panel	If controlled component has some risk significance, risk of switch cannot be NRS	2 levels lower than controlled component	Reliability of handswitches has been very good. The need to use this switch would mean failure of the automatic initiation, if applicable, and either a malfunction in the control room switch or a need to evacuate the control room, both highly unlikely events.
9	Pressure boundary	Low pressure and high volume system	LOW	Low pressure high volume characteristics of system mean that credible leakage would not have a significant impact on system operation. Typically, there are means for make-up to the system. Reliability in this area has been good

Remarks: 1. Unless ranked higher by the PRA.

2. When a critical attribute is provided for a component, it is understood that the critical attribute must function sufficiently enough to meet the design functional requirements associated with that attribute. For example, the attribute "Permit Flow in normal direction", as given to a check valve is understood to mean that the check valve must not only open in the normal direction of flow, but must open sufficiently enough to meet design flow requirements.
3. For a valve, the critical attribute of "pressure boundary" means ability to contain the fluid if the valve is normally open and ability to contain the fluid and isolate the line if the valve is normally closed.
4. Closed and capped 1 inch or less test valves that are part of the containment isolation boundary fall under the scope of Note 1 and are NRS.

GENERAL NOTES FOR GQA REVIEW

#	SUBJECT	SCOPE	RISK (see remarks)	BASIS
10	Containment Isolation	Line penetrating containment is part of a water system	LOW	Leakage paths that would threaten public health and safety are not credible. Failure of a containment isolation valve that is normally closed or that closes upon receipt of a containment isolation signal would not lead to a radiation release to the outside environment unless multiple failures of equipment occur at nearly the same time. A loss of coolant accident must occur along with a piping break and failure of the redundant containment isolation valve to close. Containment isolation valves that are required to be open during accident conditions are in a closed water system which is under duty during accident conditions and, therefore, represent pathways for mass and inventory to enter containment and, if exiting containment, represent mass and inventory which is contained in a closed system. In addition, the piping systems have a much higher pressure rating than the containment building.
11	Alarm Instrumentation		No higher than LOW	Provides useful information to operator, but failure would not, in and of itself, fail a risk significant system function. Diversity of alarm indication and system parameter indication are typically available.
12	Panels, Enclosures, and Terminal boards		No higher than LOW	Ranked LOW if they contain risk significant components; otherwise ranked NRS. Passive and inherently reliable device, based on STP and industry experience.
13	Limit Switches	a. Indication only, i.e., does not provide actuation signal b. Not identified by Ops as being critical	NRS	Indication only. Failure would not, in and of itself, fail a risk significant system function. Diversity is available through other means, such as indication of flow, pressure, etc. In addition, valves and HVAC dampers are manipulated on a regular basis as part of routine operations. Any failure in the associated position limit switches or in the associated electrical circuitry would manifest itself during these operations.

Remarks: 1. Unless ranked higher by the PRA.

2. When a critical attribute is provided for a component, it is understood that the critical attribute must function sufficiently enough to meet the design functional requirements associated with that attribute. For example, the attribute "Permit Flow in normal direction", as given to a check valve is understood to mean that the check valve must not only open in the normal direction of flow, but must open sufficiently enough to meet design flow requirements.
3. For a valve, the critical attribute of "pressure boundary" means ability to contain the fluid if the valve is normally open and ability to contain the fluid and isolate the line if the valve is normally closed.
4. Closed and capped 1 inch or less test valves that are part of the containment isolation boundary fall under the scope of Note 1 and are NRS.

EXCERPT FROM DRAFT REVISION TO ZA-0001, GQA WORKING GROUP PROCEDURE

General Notes

General Notes are used to provide component risk justification, where needed, for similar component types that are treated the same from system to system. Examples include handswitches, indication-only instrumentation, and vent/drain valves. Due to the large number of such components and the similarity of the justification from component to component and from system to system, reference to a general note provides an efficient and consistent method to document the appropriate justification.

An example of a general note is provided below:

#	SUBJECT	SCOPE	RISK	BASIS
1	Vent, drain, test valves	1 inch or less in size	NRS	Normally closed and capped. Gross leakage not credible. Good reliability based on STP and industry experience. Operator rounds are conducted periodically and would quickly identify any leakage. The Configuration Management program, which includes initial valve lineups, the Equipment Clearance Order process, and independent/dual verifications, provides adequate controls of valve position and ensures that the valve is capped.

In the example above, the justification for vent valves one inch or less being NRS can be provided simply by referencing this note rather than repeating the detailed justification for each valve. Where a general note is used to justify a risk categorization for a particular component, the note number shall be documented in the "Additional Deterministic Input" column.

General Notes are developed by the GQA Working Group and approved for use by the Expert Panel. They are considered a controlled document and any changes, other than editorial changes, require the approval of the Expert Panel. General Notes are included in their entirety in each RSBD, even though some notes may not be applicable to that system.

Attachment 5

Open Item 13.1: STPNOC needs to clarify in its exemption request that its requested exemption does not extend to the requirements of 10 CFR 50.65(a)(4).

Response:

STP is not seeking an exemption to the requirements of 10CFR50.65(a)(4).

In addition to the above Maintenance Rule Open Item, several additional issues are raised in the body of the Draft Safety Evaluation Report related to the Maintenance Rule. These items are addressed as follows:

Section 4.3.1, last paragraph: Further, the licensee states that the risk-significant functions of safety-related HSS and MSS components will only be subject to monitoring under the Maintenance Rule at the system/train level. The licensee also needs to address the monitoring of the risk-significant functions of safety-related HSS and MSS SSCs at the component level.

Response:

Most performance criteria used to monitor functions at STP are at the system and train level. However, maintenance rule functional failures (MRFFs) at the component level and the unavailability of individual components are counted/monitored against the performance criteria if they affect the function of the system or train. If a function scoped in the Maintenance Rule is lost, then we determine which component actually failed. The failed component is counted as an MRFF, and this MRFF counts against the applicable train/system. Therefore, STPNOC will continue to monitor most component reliability and availability at the system and train level.

In addition to its maintenance rule monitoring, STP will continue to perform other types of monitoring at a component level. As explained in draft UFSAR Section 13.7.4, STP will be monitoring component performance through its Corrective Action Program, periodic reviews by the Working Group of equipment performance changes, system engineering performance monitoring, and periodic updates to the station's PRA.

Sections 4.3.1 and 4.3.2, first paragraphs of both: The staff expects the performance of these SSCs to be monitored at the train or component level and all failures need to be evaluated. If the provisions of 10 CFR 50.65 are used to meet this condition, those provisions need to be supplemented to monitor all functional failures of those SSCs (not just maintenance preventable failures).

Response:

As was stated above, all component failures in Maintenance Rule scoped systems are evaluated. If the failures cause a loss of a Maintenance Rule scoped function, then the failures are tracked by plant/train level MRFF performance criteria. STP does not use the concept of "preventable" (i.e., MPFFs) as part of our MRFF determination process. Our Maintenance Rule program assumes that virtually all losses of Maintenance Rule scoped functions could have been prevented with the proper maintenance and thus these losses of function would be considered to be MRFFs. Only the loss of a scoped function that was not associated with broadly defined "maintenance" would not be counted as an MRFF. For example, if an Operator not involved in any maintenance related activity accidentally secured a pump needed to support a Maintenance Rule function, then this would not be counted against the MRFF performance criteria (this would be handled separately under our Condition Reporting program). However, such non-maintenance failures will be monitored as part of the other processes discussed in the preceding response.