

September 2, 2003

LICENSEE: STP Nuclear Operating Company

FACILITY: South Texas Project, Unit 1 and Unit 2

SUBJECT: SUMMARY OF HEADQUARTERS AND SOUTH TEXAS PROJECT
NUCLEAR OPERATING COMPANY TELEPHONE CONFERENCE CALL
OF JULY 2, 2003, REGARDING STAFF REVIEW ISSUES WITH THE
SOUTH TEXAS PROJECT PROPOSED RISK-INFORMED INSERVICE
TESTING PROGRAM (TAC NOS. MB8948 AND MB8949)

On July 2, 2003, the U. S. Nuclear Regulatory Commission (NRC) Headquarters staff held a telephone conference call with STP Nuclear Operating Company (STPNOC), the licensee for South Texas Project (STP), Units 1 and 2. The purpose of the telephone conference call was to discuss the proposed Risk-Informed Inservice Testing (RI-IST) program submittal. The staff had previously transmitted 6 technical issues concerning the RI-IST submittal to STP on May 29, 2003 (ADAMS ML031490352). To support the July 2, 2003, discussions STP had provided the staff with some brief responses to the NRC's technical issues along with a matrix depicting the relationship of the proposed RI-IST change with respect to the previously approved special treatment exemption (Enclosure 1). A list of participants is enclosed as Enclosure 2.

During the call, STP provided clarifying and amplifying information about their proposed RI-IST program in response to the staff's concerns.

STP agreed that they could have done a better job documenting why their proposed RI-IST ranking for components differed from the special treatment exemption ranking. STP said they felt they could document the basis for these differences to the staff's satisfaction. The staff suggested that STP not start this substantive effort until after the staff makes a decision on the proposed RI-IST categorization approach.

The telephone conference call ended with STP and NRC staff indicating that they understood each others positions on the issues and that the NRC staff would discuss the viability of the STP proposed categorization approach with NRR management. The staff agreed to get back to STP on their proposed categorization approach as soon as practical. The STP personnel

also indicated they would further consider the NRC comments with respect to their proposed RI-IST methodology. Both parties agreed to have a follow-up discussion after the requisite internal interactions have been held.

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures: 1. STP bullet responses to fundamental review issues with matrix
 2. List of Participants

cc w/encls: See next page

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DISTRIBUTION:

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PDIV-1 Reading

RidsNrrAdpt (BSheron/MKotzalas)	RidsRgn4MailCenter (AHowell)
RidsNrrDlpm (LMarsh/ELeeds)	RidsNrrDe (RBarrett/CGrimes)
RidsNrrDlpmLpdiv (HBerkow)	RidsNrrDlpmLpdiv1 (RGramm)
RidsNrrDssa (SBlack/MJohnson)	RidsAcrsAcnwMailCenter
RidsNrrPMDJaffe	RidsNrrDeEmeb (DTerao)
RidsNrrLAMMcAllister	DFischer
DHarrison	RidsOgcRp
TScarbrough	RidsNrrPMMThadani
MTschiltz	JClark

ADAMS Accession No.: ML032461348

NRC-001

OFFICE	PDIV-1/SECY	PDIV-1/SC	PDIV
NAME	DBaxley	RGramm	HBerkow
DATE	9 / 02 /2003	9 / 02 /2003	9 / 02 /2003

OFFICIAL RECORD COPY

South Texas Project, Unit 1 and Unit 2

cc:

Mr. Cornelius F. O'Keefe
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

A. Ramirez/C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Mr. L. K. Blaylock
Mr. W. C. Gunst
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Mr. C. A. Johnson/A. C. Bakken
AEP Texas Central Company
P. O. Box 289
Mail Code: N5022
Wadsworth, TX 77483

INPO
Records Center
700 Galleria Parkway
Atlanta, GA 30339-3064

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

D. G. Tees/R. L. Balcom
Texas Genco, LP
P. O. Box 1700
Houston, TX 77251

Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
Bay City, TX 77414

A. H. Gutterman, Esq.
Morgan, Lewis & Bockius
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Mr. T. J. Jordan, Vice President
Engineering & Technical Services
STP Nuclear Operating Company
P. O. Box 289
Wadsworth, TX 77483

S. M. Head, Manager, Licensing
Nuclear Quality & Licensing Department
STP Nuclear Operating Company
P. O. Box 289, Mail Code: N5014
Wadsworth, TX 77483

Environmental and Natural Resources
Policy Director
P. O. Box 12428
Austin, TX 78711-3189

Jon C. Wood
Matthews & Branscomb
112 East Pecan, Suite 1100
San Antonio, TX 78205

Arthur C. Tate, Director
Division of Compliance & Inspection
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756

Brian Almon
Public Utility Commission
William B. Travis Building
P. O. Box 13326
1701 North Congress Avenue
Austin, TX 78701-3326

South Texas Project, Unit 1 and Unit 2

cc:

Susan M. Jablonski
Office of Permitting, Remediation
and Registration
Texas Commission on
Environmental Quality
MC-122
P.O. Box 13087
Austin, TX 78711-3087

Mr. Terry Parks, Chief Inspector
Texas Department of Licensing
and Regulation
Boiler Division
P. O. Box 12157
Austin, TX 78711

Mr. Ted Enos
4200 South Hulen
Suite 630
Ft. Worth, Texas 76109

Mr. James J. Sheppard
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

NRC Staff's Issues with STPNOC's Proposed RI-IST Program

STP has reviewed the NRC staff feedback on the subject submittal, and believes that additional clarification is needed on each of the identified issues as stated below:

Issue 1 – RI-IST will recategorize SSCs

- RI-IST does not recategorize SSCs – SSCs remain categorized as per the STP Exemption
- RI-IST does not affect program scope – RI-IST merely identifies appropriate treatment strategies for scoped SSCs
- Reg Guides 1.174 and 1.175, as well as OMN-3 guidance, were followed to determine the appropriate treatment strategies

Issue 2 – Proposed RI-IST and the STP Exemption impacts must be considered together

- The STP Exemption and the proposed RI-IST are separate issues – the Exemption determined the scope of SSCs in the IST Program, while RI-IST determines the treatment strategy for those SSCs remaining in the IST scope
- The sensitivity studies used to demonstrate the acceptability of the STP Exemption approach remain bounding for the proposed RI-IST

Issue 3 – Proposed RI-IST does not properly address passive functions

- Certain SSCs are categorized as HIGH/MEDIUM due to pressure boundary considerations only – these SSCs do not require pressure boundary testing under either IST or proposed RI-IST
- In the PRA, passive refers to an SSC performing its function without changing state
- SSC repositioning after an event is an active function – the PRA specifically models off-normal states and the recovery actions as applicable
- RI-IST will test all safety functions as required by the Code

Issue 4 – RI-IST will not properly test scoped components

- Per the approved STP Exemption, SSCs categorized as LOW/NRS are removed from the scope of IST – LOW/NRS SSCs are not within the scope of the RI-IST request
- RI-IST merely applies treatment strategies for scoped SSCs consistent with RG1.175
- Per RG1.175, staggered testing of valve groups is permitted – test interval is no greater than the number of valves in a group x 18 months – we will not exceed a test interval of 6 years
- The STP proposal is consistent with RI-IST programs already approved for Comanche Peak and San Onofre

Issue 5 – HSS/MSS SSCs must be evaluated for enhanced treatment

- Per the STP Exemption, Box 2 SSCs must be evaluated for enhanced treatment – there are no Box 2 SSCs in the existing IST Program or in the proposed RI-IST Program
- During the categorization process (which is not part of this RI-IST request), Box 1 SSCs are evaluated for enhanced treatment only if beyond design basis functions are identified
- STP has chosen to add certain safety significant SSCs into the RI-IST program which are not scoped in the existing IST Program – these new SSCs will be trended as part of their treatment

Issue 6 – Common cause is not properly addressed in the proposed RI-IST

- STP's approach to common cause is extremely conservative – if we were to apply a common cause approach similar to already-approved RI-IST programs, a significant number of STP's SSCs would migrate from a more robust treatment approach to a more relaxed treatment approach
- ASME PRA standard (DG-1122) does not require modeling of inter-system common cause
- STP's cultural approach to potential common cause issues is both a strength and is conservative, as highlighted by the recent MOV issue – following 100% inspection by STP, only the initial identified deficiency could have affected component functionality

Risk-Informed Inservice Testing Program Matrix

RISC-1 Safety Related High Safety Significant	RISC-2 Non-Safety Related High Safety Significant
RISC-3 Safety Related Low Safety Significant	RISC-4 Non-Safety Related Low Safety Significant

IST TREATMENT

		HIGH	MEDIUM	LOW
EXEMPTION CATEGORIZATION	HIGH	SSC Not Exempt IST Code Test Enhanced Testing 13 Valve Groups - 40 Valves 4 Pump Groups - 10 Pumps *1 Valve Group - 3 Valves	SSC Not Exempt IST Extended Interval with Compensatory Measure 8 Valves Groups - 31 Valves 4 Pump Groups - 12 Pumps *1 Valve Group - 3 Valves	SSC Not Exempt IST Extended Interval with Performance Monitoring 4 Valve Groups - 13 Valves 0 Pumps - 0 Pumps * 2 Valve Groups - 6 Valves
	MEDIUM	SSC Not Exempt IST Code Test Enhanced Testing 0 Valve Groups - 0 Valves 0 Pump Groups - 0 Pumps	SSC Not Exempt IST Extended Interval with Compensatory Measure 11 Valve Groups - 39 Valves 1 Pump Group - 2 Pumps	SSC Not Exempt IST Extended Interval with Performance Monitoring 39 Valve Groups - 131 Valves 1 Pump Group - 2 Pumps
	LOW	SSC Exempt IST Code Test Enhanced Testing 0 Valve Groups - 0 Valves 0 Pump Groups - 0 Pumps	SSC Exempt IST Extended Interval with Compensatory Measure 0 Valve Groups - 0 Valves 0 Pump Groups - 0 Pumps	SSC Exempt IST Extended Interval with Performance Monitoring 92 Valve Groups - 186 Valves 3 Pump Groups - 8 Pumps
	NRS	SSC Exempt IST Code Test Enhanced Testing 0 Valve Groups - 0 Valves 0 Pump Groups - 0 Pumps	SSC Exempt IST Extended Interval with Compensatory Measure 0 Valve Groups - 0 Valves 0 Pump Groups - 0 Pumps	SSC Exempt IST Extended Interval with Performance Monitoring 20 Valve Groups - 57 Valves 0 Pump Groups - 0 Pumps

* Valve group has different ranks for the open and close functions

TREATMENT COMPARISONS

	Commache Peak IST	SONGS IST	STP IST
HIGH	138 SSCs - 20.7%	114 SSCs - 15.8%	53 SSCs - 9.9%
MEDIUM	N/A	64 SSCs - 7%	87 SSCs - 16.2%
LOW	529 SSCs - 79.3%	693 SSCs - 76.1%	397 SSCs - 73.9%

	STP EXEMPTION RANKS	STP IST w/Code Thresholds
HIGH	112 SSCs - 20.9%	17 SSCs - 3.2%
MEDIUM	174 SSCs - 32.4%	35 SSCs - 6.5%
LOW	194 SSCs - 36.1%	485 SSCs - 90.3%
NRS	57 SSCs - 10.6%	

LIST OF PARTICIPANTS
STP/NRC TELEPHONE CONFERENCE CALL

JULY 2, 2003

Licensee's Participants

S. Head
G. Schinzel
W. Stilwell
P. Walker
B. Scott

NRC Participants

D. Harrison
D. Fischer
M. Thadani
D. Terao
H. Berkow
M. Tschiltz