



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

August 18, 2011  
NOC-AE-11002716  
10CFR54  
STI: 32916347  
File: G25

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2746

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Response to Request for Additional Information for the  
South Texas Project License Renewal Application (TAC Nos. ME4936 and ME4937)

- References:
1. STPNOC Letter dated October 25, 2010, from G. T. Powell to NRC Document Control Desk, "License Renewal Application" (NOC-AE-10002607) (ML103010257)
  2. STPNOC letter dated June 23, 2011, from G. T. Powell to NRC Document Control desk, "Response to Request for Additional Information for the South Texas Project License Renewal Application" (NOC-AE-11002683) (ML11181A037)
  3. Teleconference between the STPNOC and the NRC on August 8, 2011 (ML11222A001)

By Reference 1, STP Nuclear Operating Company (STPNOC) submitted a License Renewal Application (LRA) for South Texas Project (STP) Units 1 and 2. By Reference 2, STP provided a response to a request for additional information by the Nuclear Regulatory Commission regarding the future use of operating experience to identify aging issues, evaluate them, and, as necessary, enhance Aging Management Programs (AMP) or develop new AMPs for license renewal. During a teleconference with the Nuclear Regulatory Commission staff on August 8, 2011 (Reference 3), STP agreed to provide additional clarification to the response provided in Reference 2. The clarification is provided in the enclosure to this letter. LRA Amendment 3 resulting from the response is included with the enclosure.

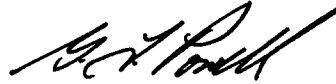
There are no regulatory commitments in this letter.

Should you have any questions regarding this letter, please contact either Arden Aldridge, STP License Renewal Project Lead, at (361) 972-8243 or Ken Taplett, STP License Renewal Project regulatory point-of-contact, at (361) 972-8416.

A147  
NRR

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 18, 2011  
Date



G. T. Powell  
Vice President,  
Technical Support & Oversight

KJT

Enclosure: Clarification to STPNOC Response to Request for Additional Information (includes Amendment 3 to the LRA)

cc:

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**Clarification to STPNOC Response to Request for Additional Information**

**SOUTH TEXAS PROJECT  
LICENSE RENEWAL APPLICATION  
REQUESTS FOR ADDITIONAL INFORMATION  
REGARDING THE USE OF OPERATING EXPERIENCE**

- References:
1. STPNOC letter dated June 23, 2011, from G. T. Powell to NRC Document Control desk, "Response to Request for Additional Information for the South Texas Project License Renewal Application", (NOC-AE-11002683) (ML11181A037)
  2. Teleconference between the STPNOC and the NRC on August 8, 2011 (ML11222A001)
  3. STPNOC Letter dated October 25, 2010, from G. T. Powell to NRC Document Control Desk, "License Renewal Application", (NOC-AE-10002607) (ML103010257)

**NRC Requested Information:**

By Reference 1, STP provided a response to a request for additional information by the Nuclear Regulatory Commission regarding the future use of operating experience to identify aging issues, evaluate them, and, as necessary, enhance Aging Management Programs (AMP) or develop new AMPs for license renewal. During a teleconference with the Nuclear Regulatory Commission staff on August 8, 2011 (Reference 2), STP agreed to provide additional clarification to the responses provided in Reference 1. Specifically, the staff requested that STP clarify the intended location within its Updated Final Safety Analysis Report supplement that describes how STP will use future operating experience to inform and modify, as required, its aging management programs.

**STPNOC Response:**

STP revised Section A1 of the Updated Final Safety Analysis Report supplement to describe how future operating experience will be used to inform and modify, as required, its aging management programs. This revision is attached to this enclosure as Amendment 3 to the License Renewal Application.

**Attachment to Enclosure**

**Amendment 3**

**to the South Texas Project**

**License Renewal Application**

Note: Changes to the License Renewal Application are annotated by lined-in information and a change bar.

**Appendix A**  
**Final Safety Analysis Report Supplement**

**A1 SUMMARY DESCRIPTIONS OF AGING MANAGEMENT PROGRAMS**

The integrated plant assessment and evaluation of time-limited aging analyses (TLAA) identified existing and new aging management programs necessary to provide reasonable assurance that components within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis (CLB) for the period of extended operation. Sections A1 and A2 describe the programs and their implementation activities.

Three elements common to all aging management programs discussed in Sections A1 and A2 are corrective actions, confirmation process, and administrative controls. The STP Quality Assurance Program includes the elements of corrective action, confirmation process, and administrative controls, and is applicable to the safety-related and nonsafety-related systems, structures, and components that are subject to aging management activities.

Operating experience is applied to all aging management programs discussed in Sections A1 and A2. Plant-specific and industry operating experience is continuously reviewed to confirm the effectiveness of aging management programs and is utilized, as necessary, to enhance each aging management program or to develop new aging management programs in order to adequately manage the effects of aging so that the intended function(s) of structures and components are met.