



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

December 17, 2013  
NOC-AE-13003062  
10 CFR 54

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Review of License Renewal Application Safety Evaluation with Open Items  
(TAC NOS. ME4936 and ME4937)

- Reference:
1. STPNOC Letter dated October 25, 2010, from G. T. Powell to NRC Document Control Desk, "License Renewal Application" (NOC-AE-10002607) (ML103010257)
  2. Safety Evaluation Report Related to the License Renewal of South Texas Project, Units 1 and 2, dated February 15, 2013 (ST-AE-NOC-13002403) (ML13044A115)

By Reference 1, STP Nuclear Operating Company (STPNOC) submitted an application to the Nuclear Regulatory Commission (NRC) for the renewal of Facility Operating Licenses NPF-76 and NPF-80, for South Texas Project (STP) Units 1 and 2, respectively. Reference 2 transmitted the Safety Evaluation Report (SER) with Open Items related to the license renewal of the South Texas Project, Units 1 and 2.

As requested in Reference 2, STPNOC has reviewed the SER for accuracy and comments are provided in Enclosures 1 and 2 to this letter for NRC consideration.

There are no regulatory commitments in this letter.

Should you have any questions regarding this letter, please contact 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.

A handwritten signature in black ink, appearing to read "MP Murray".

Michael P. Murray  
Manager, Regulatory Affairs

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- Enclosures:
- (1) Technical Comments Regarding the Safety Evaluation Report (SER) with Open Items Related to the License Renewal of the South Texas Project, Units 1 & 2
  - (2) Editorial Comments Regarding the Safety Evaluation Report (SER) with Open Items Related to the License Renewal of the South Texas Project, Units 1 & 2

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## **Enclosure 1**

# **Technical Comments Regarding the Safety Evaluation Report (SER) with Open Items Related to the License Renewal of the South Texas Project, Units 1 & 2**

**Technical Comments Regarding the Safety Evaluation Report (SER) with Open Items  
Related to the License Renewal of the South Texas Project, Units 1 and 2**

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
1.	1-15 1-16	1-7	There are concerns with the proposed fourth licensed condition regarding foreign ownership, control, or domination.	STPNOC plans to address these concerns in separate correspondence to the NRC
2.	2-15	2.1.4.3.1	Third paragraph discusses UFSAR Section 8.3.4 regarding the SBO coping strategy. By letter dated October 28, 2013 (NOC-AE-13003041) STPNOC reported that certain aspects of the SBO coping strategy were deleted from the UFSAR. The revision did not impact license renewal scoping and screening results.	Review NOC-AE-13003041 to determine if SER requires revision.
3.	2-33	2.3.1.5.3	STPNOC concluded fuel assemblies and RCCAs are considered short-lived since they are replaced at regular intervals. Thus, no components in the reactor core system are subject to aging management review.	Revise last sentence in this Section to read: "The staff also finds that the applicant has adequately identified the system components <u>as short-lived not</u> subject to an AMR in accordance with the requirements stated in 10 CFR 54.21(a)(1)(ii)."
4.	2-37	2.3.3	By STP letter NOC-AE-11002758 (ML11335A140), the Lighting Diesel Generator was added to Section 2.3.3 of the LRA as an auxiliary system for scoping and screening. As a result, Section 2.3.3.28 was added to the LRA.  The staff evaluation (Section 2.3.3.17.2) for Fire Protection on Page 2-64 stated the applicant will	Determine if a staff evaluation of the Lighting Diesel Generator should be documented in Section 2.3.3 of the SE.

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			<p>amend the LRA to include the Lighting Diesel Generator. Section 3.3.2.3.28 of the SE documents the staff's review of the AMR results for the Lighting Diesel Generator.</p> <p>However, section 2.3.3 of the SE with Open Items does not list the Lighting Diesel Generator so that a staff evaluation of this system does not appear in this section of the SE.</p>	
5.	2-45	2.3.3.6	Add 10 CFR 54.4(a)(1) to the second paragraph following section 2.3.3.6 "Component Cooling Water". The CCW is in scope for (a)(1), (a)(2) and (a)(3)	Revise to read: "The LRA classifies the system as being within the scope of license renewal in accordance with 10 CFR 54.4( <u>a)(1)</u> , (a)(2) and (a)(3)."
6.	2-96	2.4.6.1	By STP letter NOC-AE-11002758 (ML11335A140), the East Gate House and the Lighting Diesel Generator Building and Tank Building were added to Section 2.4.6 of the LRA.	<p>Revise section to read:</p> <ul style="list-style-type: none"> <li>• <u>east gate house</u></li> <li>• fire pump house</li> <li>• fire water storage tanks foundations</li> <li>• fire water valve structures</li> <li>• <u>lighting diesel generator building and tank building</u></li> </ul>
7.	2-96	2.4.6.1	<p>By STP letter NOC-AE-11002758 (ML11335A140), the East Gate House and the Lighting Diesel Generator Building and Tank Building were added to Section 2.4.6 of the LRA.</p> <p>Add descriptions of east gate house and lighting diesel generator building and tank building to description of structures.</p>	<p>Revise section to read:</p> <p><u>"The east gate house is described as a steel framed building with a metal roof and a concrete foundation that houses administrative offices and various mechanical and electrical support systems.</u> The fire pump house is described as a metal building with a sheet metal roof on a concrete foundation that houses three fire pumps, each separated by reinforced concrete</p>

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				walls. The fire water storage tanks foundations are described as reinforced concrete ring foundations. The fire water storage tanks are evaluated separately with their respective system. <del>Finally, t</del> The fire water valve structures are metal buildings with sheet metal roofing on a concrete foundation. There are three valve structures per unit. <u>Finally, the lighting diesel generator building and tank building are masonry buildings with metal roofs and concrete foundations that house the lighting diesel generator, diesel fuel supply tank, and various mechanical and electrical support systems."</u>
8.	2-96	2.4.7.1	By STP letter NOC-AE-11002759 (ML11334A047), a description of the Switchyard Control Building was added to Section 2.4.7 of the LRA.  Add a paragraph to describe the switchyard control building.	Add following to section:  <u>"The switchyard control building is single story metal sided structure with a sheet metal roof that is supported by a reinforced concrete foundation on structural backfill. The switchyard control building houses equipment required for SBO requirements."</u>
9.	2-96	2.4.7.1	By STP letter NOC-AE-11002758 (ML11335A140), a description of yard lighting was added to Section 2.4.7 of the LRA.  Add a paragraph to describe yard lighting.	Add following to section:  <u>"The yard lighting is mounted on high mast steel poles founded on reinforced concrete bases supported on undisturbed soil and/or engineered structural backfill."</u>
10.	3-16	3.0.3.1.3	The Summary of Technical Information in the Application section, the loss of material aging effect	The Summary of Technical Information in the Application in section 3.0.3.1.3 should include

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			is discussed. However, the aging effects of cracking and wall thinning are omitted. Section B2.1.8 of the LRA states that the Steam Generator Tube Integrity program manages all three aging effects.	reference to the fact that the Steam Generator Tube Integrity program also manages the aging effects of cracking and wall thinning.
11.	3-43	3.0.3.2.2	First paragraph under the "Enhancement 2" header. The reference to stud insert #30 should reflect for Unit 2 only because insert #30 only experienced loss of bearing surface area in Unit 2.	Revise to read:  "In this enhancement, the applicant stated that procedures will be enhanced to perform a remote VT-1 examination of stud insert #30 (also called stud hole insert #30) <u>in Unit 2 only</u> , concurrent with the volumetric examination once every 10 years, to confirm no additional loss of bearing surface area."
12.	3-75	3.0.3.2.7	In the second sentence of the first paragraph of the Operating Experience section, the RCB chilled water and BTRS chilled water systems should be added as discussed in the LRA to the list of systems in which the review of operating experience has revealed no history of chemistry-related corrosion or fouling issues.	The sentence should read "The applicant stated that its review of operating experience has revealed no history of chemistry-related corrosion or fouling issues for the CCW, ESF diesel generator jacket water system, essential chilled water, <u>RCB chilled water</u> , <u>BTRS chilled water</u> , and mechanical auxiliary building chilled water systems."
13.	3-75	3.0.3.2.7	The sixth sentence of the first paragraph of the Operating Experience section omits discussion of the FPD jacket water system core replacement that was discussed in LRA Section BV2.1.10.	Revise the sentence to read: "The LRA states <del>another</del> <u>more</u> operating experience examples in which the BOP diesel jacket water system radiator was replaced due to corrosion <u>and the FPD jacket water system cores have been changed due to corrosion</u> that occurred prior to using the current corrosion inhibitor."

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14.	3-84	3.0.3.2.11	By letter dated November 30, 2011 (NOC-AE-11002758) (ML11335A140), the Lighting Diesel Generator system was added to the scope of the Fuel Oil Chemistry AMP.	Revise second sentence in the first paragraph under the Summary of Technical Information in the Application section to read:  “The applicant stated that the program manages loss of material on the internal surface of components in the standby diesel generator (SDG) fuel oil storage and transfer system, diesel fire pump fuel oil system, <u>lighting diesel generator system</u> , and BOP fuel oil system.”
15.	3-86	3.0.3.2.11	By letter dated November 30, 2011 (NOC-AE-11002758) (ML11335A140), the Lighting Diesel Generator system was added to the scope of the Fuel Oil Chemistry AMP.	Revise 2 <sup>nd</sup> sentence in Enhancement 2 paragraph to read:  “In this enhancement, the applicant stated that the program procedures will be enhanced to check and remove the accumulated water from the fuel oil drain tanks, day tanks, and storage tanks associated with the SDG, BOP, <u>lighting diesel generator</u> , and fire water pump diesel generators.”
16.	3-86	3.0.3.2.11	By letter dated November 30, 2011 (NOC-AE-11002758) (ML11335A140), the Lighting Diesel Generator system was added to the scope of the Fuel Oil Chemistry AMP.	Revise 2 <sup>nd</sup> sentence of Enhancement 3 paragraph to read:  “In this enhancement, the applicant stated that the program procedures will be enhanced to include 10-year periodic draining, cleaning, and inspection for corrosion of the SDG fuel oil drain tanks, <u>lighting diesel generator fuel oil tank</u> , and diesel fire pump fuel oil storage tanks.”  Revise 4 <sup>th</sup> sentence of Enhancement should

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				read: "The applicant also stated that the procedures will be enhanced to require periodic testing of the <u>lighting diesel generator fuel oil tank</u> and the SDG and diesel fuel oil storage tanks for microbiological organisms."
17.	3-86	3.0.3.2.11	By letter dated November 30, 2011 (NOC-AE-11002758) (ML11335A140), the Lighting Diesel Generator system was added to the scope of the Fuel Oil Chemistry AMP.	Revise 2 <sup>nd</sup> sentence of Enhancement 4 paragraph to read:  "In this enhancement, the applicant stated that the program procedures will be enhanced to require analysis for water, biological activity, sediment, and particulate contamination of the diesel fire pump fuel oil storage tanks, <u>lighting diesel generator fuel oil tank</u> , and the BOP diesel generator fuel oil day tanks on a quarterly basis."
18.	3-87	3.0.3.2.11	By letter dated November 30, 2011 (NOC-AE-11002758) (ML11335A140), the Lighting Diesel Generator system was added to the scope of the Fuel Oil Chemistry AMP.	Revise 3 <sup>rd</sup> sentence of Enhancement 6 paragraph to read:  "The program will also be enhanced to incorporate the trending of water, particulate contamination, and microbiological activity in the SDG and diesel fire pump fuel oil storage tanks, <u>lighting diesel generator fuel oil tank</u> , and the BOP diesel generator fuel oil day tanks."
19.	3-119	3.0.3.2.17	The 5 <sup>th</sup> sentence of the second paragraph on the page states that a total of 22 tubes were repositioned. However, the table that was provided by letter dated September 15, 2011 (NOC-AE-1100273) (ML11266A020) as part of the response to	Revise sentence to read:  "The applicant also stated that, during this time interval, a total of <del>22</del> <u>34</u> tubes were repositioned by approximately 2 ½ in."

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			RAI B2.1.21-3 indicated that 34 tubes were repositioned.	
20.	3-126	3.0.3.2.19	Enhancement 2 states that the staff reviewed this enhancement against the corresponding program elements in GALL Report AMP XI.M39. However, there is no mention of whether or not the staff finds this enhancement acceptable.	A statement should be added that the staff finds this enhancement acceptable, or provide reasons why further information is required.
21.	3-188	3.0.3.2.28	STP letter dated November 21, 2011 (NOC-AE-11002759) (ML11334A047) deleted "augmented inspections" from the Metal Fatigue of Reactor Coolant Pressure Boundary Program. See Commitment 30 in Appendix B.	Revise 4 <sup>th</sup> bullet on page to read: <ul style="list-style-type: none"> <li>• "include appropriate corrective actions to be invoked if a component approaches a cycle count action limit or a fatigue usage action limit (Acceptable corrective actions include fatigue reanalysis, repair, or replacement <del>or augmented inspections</del>. Reanalysis of a ..."</li> </ul>
22.	3-210	3.0.3.3.3	In the first paragraph on the page, in two places references are made to "carbon" content of material when they should state "iron" content.	Revise 5 <sup>th</sup> sentence of paragraph that starts on previous page to read: "Applying the highest aluminum content and lowest <del>carbon</del> <u>iron</u> content, and expected composition of the base metal weld metal; puddle, a weld deposit of 9.07 percent aluminum and 1.08 percent <del>carbon</del> <u>iron</u> is obtained."
23.	3-228	3.0.5.2.3	Under the header <u>Sources of Operating Experience</u> , the SER states that the applicant's February 27, 2012 response stated that NRC LR-ISG and GALL revisions were added to source documents reviewed by applicant's Operating Experience Program	Revise sentence to read: "The applicant's response dated February 27, 2012, <u>committed the applicant to add further states that</u> NRC License Renewal Interim Staff Guidance and revisions to the GALL Report

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			(OEP). The February 27 <sup>th</sup> letter (ML12069A024) stated the referenced source documents will be added as part of LRA Commitment 41 with implementation date of December 31, 2014. By letter dated December 6, 2012 (ML12359A063), the commitment implementation date was revised to “no later than the date the renewed operating licenses are issued”. The OEP has not been revised yet to add the referenced source documents.	<del>were added to the</del> as source documents reviewed <u>under the OEP.</u> ”
24.	3-229	3.0.5.2.3	Under the header <u>Information Considered in Operating Experience Evaluations</u> , the SER states the applicant’s February 27, 2012 response stated the OEP considers the characteristics listed in the second sentence of the paragraph. The February 27 <sup>th</sup> letter (ML12069A024) stated the OEP will be revised to include aging effects to the list of characteristics that may require further evaluation and consider the characteristics described in the SER as part of Commitment 41. This information commitment has not been implemented yet.	“The applicant’s response dated February 27, 2012, states that the OEP <u>will be revised to include “aging effects” to the list of characteristics for determining applicability of an OE document that may require further evaluation.</u> <del>Evaluations should consider screens plant-specific and industry operating experience documents for applicability and considers the</del> following characteristics: SSCs, materials, environments, aging effects, aging mechanisms, and AMPs.”
25.	3-249	Table 3.1-1	For line Item 3.1.1.70, under the column “AMP in LRA Supplements, or Amendments”, clarify that the “inspections of small-bore piping” is a “one-time inspection”.	Revise to read: “ASME Section XI ISI (IWB, IWC, and IWD) and Water Chemistry programs <u>and One-Time</u> Inspections of small-bore piping performed by the ASME Section XI ISI (IWB, IWC, and IWD) Program.”
26.	3-253	3.1.2.1	The LRA listed Reactor Vessel Surveillance and	Add Reactor Vessel Surveillance and Water

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			Water Chemistry programs that manage aging effects for the RV, RVIs, RCS, and SG components	Chemistry programs to list of programs in Section 3.1.2.1.
27.	3-256	3.1.2.1.2	In the third sentence of the second paragraph, only one title of AMP proposed by the applicant differs from the GALL.	Revise sentence to read:  “These AMPs were found to be consistent with the GALL Report or sufficient to manage the aging of components within the scope of the AMP. While the staff notes that there <del>is</del> are a substantial differences in the titles of the <u>Nickel Alloy</u> AMPs proposed by the applicant and recommended by the GALL Report, due to recent changes in 10 CFR 50.55a, there is no effective difference in these approaches.”
28.	3-283	3.1.2.3.1	Clarify the list of nickel alloy components in the first sentence of the first paragraph.	Revise sentence to read:  “In LRA Tables 3.1.2-1, 3.1.2-3, and 3.1.2-4, the applicant stated that for nickel alloy <del>componentsRV penetrations—including penetration</del> nozzles and welds, <del>and safe end welds and monitoring tubes</del> —exposed to air with borated water leakage, there is no aging effect, and no AMP is proposed.”
29.	3-286	3.1.2.3.3	Clarify the list of nickel alloy components in the first sentence of the first paragraph.	Revise to read:  “In LRA Table 3.1.2-3, the applicant stated that for nickel alloy <u>Pressurizer</u> <del>RV penetrations—including nozzles and safe ends</del> exposed to air with borated water leakage—there is no aging effect, and no AMP is proposed.”

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30.	3-286	3.1.2.3.4	Clarify the list of nickel alloy components in the first sentence of the first paragraph.	Revise to read:  "In LRA Table 3.1.2-4 the applicant stated that for nickel alloy <u>SG Primary penetrations</u> — <del>including</del> nozzles and safe ends exposed to air with borated water leakage—there is no aging effect, and no AMP is proposed."
31.	3-290	Table 3.2-1	For line Item 3.2.1.15, in SE Section 3.2.2.2.8, Item 2, the staff found the item not applicable to STP.	Revise column "Staff Evaluation" in Table 3.2-1 to read:  <del>Consistent with the GALL Report.</del>  <u>Not applicable to STP.</u>  (SER Section 3.2.2.2.8, Item 2)
32.	3-291	Table 3.2-1	For line item 3.2.1.17, the type column (BWR/PWR) in NUREG-1800 Rev 1 appears to be incorrect and should be (BWR). The only item in NUREG-1801 Rev 1 for the NUREG-1800 Related Item (E-42) is V.B-9. NUREG-1801 Rev 1 Table V.B Engineering Safety Features Standby Gas Treatment System (BWR) is for BWR only. There is no NUREG-1800 related item (E-42) for PWR in NUREG-1801 Rev 1.	Revise column "Staff Evaluation" in Table 3.2-1 to read:  Not applicable to <del>STP</del> <u>PWR</u>  (SER Section 3.2.2.2. <del>19</del> )
33.	3-292	Table 3.2-1	For line item 3.2.1.26, SE Section 3.2.2.1.1 indicates not applicable to STP.	Revise column "Staff Evaluation" in Table 3.2-1 to read:  <del>Consistent with the GALL Report.</del>  <u>Not applicable to STP.</u>

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				(SER Section 3.2.2.2.1)
34.	3-378	3.3.2.3.7	Remove the SER Section that discusses Gray Cast Iron Solenoid Valve Exposed to Portable Water. This is a duplicate of the information in SER Section 3.3.2.2.27	
35.	3-407	Table 3.4-1 (3.4.1.3)	For line item 3.4.1.3, SER Section 3.4.2.2.2 Item 1 indicates not applicable to STP.	Revise column "Staff Evaluation" in Table 3.4-1 to read:  <u>Not Applicable to STP</u> <del>Consistent with the GALL Report</del> (SER Section 3.4.2.2.2, item 1)
36.	3-413	Table 3.4-1	For line item 3.4.1.38. STPNOC letter dated January 18, 2012 (ML12020A072) revised the LRA to state component group is applicable to STPNOC. Shouldn't AMP in LRA column be revised to reflect change and state "Boric Acid Corrosion program"?	Revise "AMP in LRA Supplements or Amendments" column of Table 3.4-1 to delete "Not applicable of STP" and add "Boric Acid Corrosion Program".
37.	3-421	3.4.2.2.2	For the second paragraph on the page, item 3.4.1.3 is associated with the heat exchangers.	Revise to read:  "The applicant stated that for items 3.4.1.2, <del>3.4.1.3</del> , 3.4.1.4, and 3.4.1.6, the applicability is limited to steel piping, piping components, piping elements, and tanks (treated water only) exposed to steam and treated water. <u>The applicant stated that for items 3.4.1.3</u> <del>The staff noted that a search of the applicant's LRA and UFSAR confirmed that no in-scope steel heat exchanger components exposed to treated water</del>

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				are present in the steam and power conversion systems. <u>The staff searched the applicant's LRA and UFSAR confirms that no in-scope steel heat exchanger components exposed to treated water are present in the steam and power conversion systems."</u>
38.	3-433	3.4.2.3.6	STP letter dated November 30, 2011 NOC-AE-12002758 (ML11335A140) added copper alloy >15% zinc solenoid valves to Table 3.4.2-6 with a generic note G. Add a discussion about copper alloy >15% zinc material similar to that in SER Section 3.4.2.3.2.	Add to section:  "Copper Alloy (Greater than 15 Percent Zinc) Solenoid Valve Exposed to Plant Indoor Air. The staff's evaluation for copper alloy (greater than 15 percent zinc) solenoid valves internally exposed to plant indoor air, which will be managed for loss of material by the Selective Leaching of Materials Program and cite generic note G, is documented in SER Section 3.3.2.3.7."
39.	3-444	Table 3.5-1	For line items 3.5.1.26 and 3.5.1.27, Section 3.5.2.2.2.2 of SER should also be referenced.	Revise Staff Evaluation column to read:  Consistent with GALL Report  (SERs Sections <u>3.5.2.2.2.1</u> and <u>3.5.2.2.2.2</u> )
40.	3-445	Table 3.5-1	For line item 3.5.1.28, Section 3.5.2.2.2.2 of SER should also be referenced.	Revise Staff Evaluation column to read:

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				Consistent with GALL Report  (SERs Sections <u>3.5.2.2.2.1</u> and <u>3.5.2.2.2.2</u> )
41.	3-445 3-448	Table 3.5-1	For line items 3.5.1.9, 3.5.1.30, 3.5.1.41. SER states Structures Monitoring Program is the AMP in the LRA. This is contrary to the LRA which states STPNOC does not have these component groups so that they are not applicable for aging management.	Revise "AMP in LRA Supplements or Amendments" column of Table 3.5-1 to delete "Structures Monitoring Program" and add "Not applicable of STP".
42.	3-449	Table 3.5-1	For line item 3.5.1.43, reference to SER section is omitted.	Add following to Staff Evaluation column:  <u>"(SER Section 3.5.2.1.2)"</u>
43.	3-449	Table 3.5-1	For line item 3.5.1.47, reference to SER section is omitted.	Add following to Staff Evaluation column:  <u>"(SER Section 3.5.2.1.3)"</u>
44.	3-450	Table 3.5-1	For line item 3.5.1.50, reference to SER section is omitted.	Add following to Staff Evaluation column:  <u>"(SER Section 3.5.2.1.3)"</u>
45.	3-451	Table 3-451	For line item 3.5.1.57. SER states Subsection IWF Program is the AMP in the LRA. This is contrary to the LRA which states STPNOC does not have this component group so that it is not applicable for	Revise "AMP in LRA Supplements or Amendments" column of Table 3.5-1 to delete "ASME Section XI, Subsection IWF Program" and add "Not applicable of STP".

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			aging management.	
46.	3-452	3.5.2.1	The Coatings AMP is omitted from the bulleted list.	Add to the bulleted list: <u>"Protective Coating Monitoring and Maintenance"</u>
47.	3-488	3.5.2.3.2	The title of this SER section indicates that it is to address the Control Room. The discussion of "Coatings exposed to plant indoor air" is not applicable to the Control Room.	Move the discussion of "Coatings exposed to plant indoor air" to SER Section 3.5.2.3.1, which addresses the Containment Building. Renumber follow on sections of SER.
48.	3-489	3.5.2.3.5	The 1 <sup>st</sup> sentence of the 1 <sup>st</sup> paragraph refers to "stainless steel supports." Stainless steel supports are not associated with gypsum and plaster barriers.	Revise 1 <sup>st</sup> sentence to read: "The staff's evaluation for gypsum and plaster barriers <del>(and stainless steel supports)</del> exposed to..."
49.	3-490	3.5.2.3.6	1 <sup>st</sup> paragraph refers to "stainless steel supports." Stainless steel supports are not associated with gypsum and plaster barriers.	Revise 1 <sup>st</sup> sentence to read: "The staff's evaluation for gypsum and plaster barriers <del>and stainless steel supports</del> exposed to..."
50.	3-497	Table 3.6-1 (3.6.1.14)	For line item 3.6.1.14, STP does not have any fuse holders that are not part of a larger assembly.	Revise the Staff Evaluation column to read:  <del>Consistent with the GALL Report</del> <u>Not Applicable to STP</u>

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
				( <u>SER Section 3.6.2.1.1</u> )
51.	3-498	3.6.2.1.1	STP does not have any fuse holders that are not part of a larger assembly.	Revise the second paragraph to include Table 3.6-1 Item 3.6.1.14.  "Fuse Holders ( <del>Metallic Clamps</del> ).  In LRA Table 3.6.1, items <u>3.6.1.6</u> and <u>3.6.1.14</u> , under fuse holders (not part of a larger assembly) metallic clamp <u>and insulation material</u> , the applicant states that all fuse holders—including the fuses installed for electrical penetration protection—are part of larger assemblies."
52.	A-2 A-3	Appendix A	Commitment 4 was revised in STPNOC letters of August 21, 2012 (ML12248A148) and December 19, 2012 (ML12363A102).	Revise Commitment 4 description to capture changes in referenced letters. Add following reference letters.  NOC-AE-12002897, August 21, 2012 NOC-AE-12002942, December 19, 2012
53.	A-17 A-18	Appendix A	Commitment 39 may be revised in future depending on outcome of resolving NRC concerns with Selective Leaching of Aluminum Bronze Aging Management Program.	To be provided in STPNOC response to NRC RAI letter dated December 18, 2012 (ML12333A227)
54.	A-20 A-21	Appendix A	Commitment 44 may be revised in future depending on outcome of resolving NRC concerns with Selective Leaching of Aluminum Bronze Aging Management Program.	To be provided in STPNOC response to NRC RAI letter dated December 18, 2012 (ML12333A227)  Revise Implementation Scheduled to February

No.	SER Location		Comment	Suggested Resolution (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
			Implementation Schedule revised by STPNOC letter December 19, 2012 (ML12363A102).	28, 2014 Add Reference Letter NOC-AE-12002942, December 19, 2012
55.	A-21 A-22	Appendix A	Commitment 45 may be revised in future depending on outcome of resolving NRC concerns with Selective Leaching of Aluminum Bronze Aging Management Program.  Implementation Schedule revised by STPNOC letter December 19, 2012 (ML12363A102).	To be provided in STPNOC response to NRC RAI letter dated December 18, 2012 (ML12333A227) Revise Implementation Scheduled to February 28, 2014 Add Reference Letter NOC-AE-12002942, December 19, 2012
56.	A-22	Appendix A	Commitment 46 Implementation Schedule revised by STPNOC letter December 19, 2012 (ML12363A102).	Revise Implementation Scheduled to February 28, 2014 Add Reference Letter NOC-AE-12002942, December 19, 2012

## **Enclosure 2**

### **Editorial Comments Regarding the Safety Evaluation Report (SER) with Open Items Related to the License Renewal of the South Texas Project, Units 1 & 2**

**Editorial Comments Regarding the Safety Evaluation Report (SER) with Open Items  
Related to the License Renewal of the South Texas Project, Units 1 and 2**

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
1.	1-12	1-3	First paragraph on page states that one update letter was submitted dated November 30, 2011.	Add that additional annual update letters were submitted on October 29, 2012 and on October 28, 2013.
2.	1-14	1-5	Under the paragraph headed by OI 3.0.3.2.6-2: Regarding the July 12, 2012 RAI B2.1.9-3c, STPNOC provided a response (ML12248A148) and a subsequent RAI letter (ML12311A438) was issued by the NRC.	Add that STPNOC addressed the issues by letter dated August 21, 2012. Subsequently, the staff issued an additional RAI B2.1.9-3d by letter dated November 19, 2012.
3.	1-14	1-5	Under the paragraph headed by OI 3.0.3.1.4-1: The second to last sentence in the paragraph references an incorrect letter and RAI number. The correct letter is ML12256B049.	Correct the sentence to refer to a letter dated October 3, 2012 and the staff issued RAI B2.1.1.16-3.
4.	2-24	2.1.5.3.1	Some words are missing from an LRA section quoted, in part, in this section of the SER.	Revise last sentence of LRA Section 2.1.4.1 quoted to read:  "If an in-scope structural <del>the</del> component was determined to be subject to replacement based on a qualified time period, the component was identified as short-lived and was excluded from an AMR."
5.	2-29	2.3.1	Complete title of this section	Revise to read:

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
				2.3.1.1 Reactor Vessel, <del>and Internals</del> <u>and Reactor Coolant System</u>
6.	2-42	2.3.3.4.2	Drawing number not complete in last sentence in last paragraph on page.	Revise to read: LR-STP-EW-5R289F05038#1-3.
7.	2-47	2.3.3.6.2	In the first sentence of the first full paragraph on the page, the applicant stated they "would revise" as opposed to stating the referenced drawings "were revised: in the response to the August 19, 2011 letter.  The drawings were subsequently revised and sent to the NRC by letter of November 3, 2011 (NOC-AE-11002749) (ML11318A121)	In its response dated August 9, 2011, the applicant stated that <del>it</del> <u>they would</u> revise license renewal boundary drawings LR-STP-CC-5R209F05020#1 and LR-STP-CC-5R209F05020#2 to add spatial interaction termination symbols on pipe sections 1"CC1647XC7 and 1"CC2647XC7 before continuing to the next drawing because the piping leaves the area of safety-related components at those points. <u>The drawings were revised and sent in a letter dated November 3, 2011.</u>
8.	2-48	2.3.3.7.2	Some drawings and component IDs on the page had editorial errors.	In RAI 2.3.3.7-1, dated July 12, 2011, the staff noted on license renewal drawing LR-STP-IA-80Q119F00048#1-1, coordinates G/H-6, 7, and 8, an instrument air compressor (80Q111MC00014), including the check valves and continuation piping, shown as being within the scope of license renewal for 10 CFR 54.4(a)(3). However, for the standby unit instrument air compressors (80Q111MC00011, 80Q111MC00012, and 80Q111MC00013), the

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
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				<p>license renewal boundary is shown to end at ball valves IA9813 (coordinates F-6), IA9814 (coordinates G-5), and IA9821 (coordinates F-6).</p> <p>A similar condition exists on the Unit 2 license renewal drawing LR-STP-IA-80Q119F00048#2-1.</p> <p>Based on its review, the staff finds the applicant's response to RAI 2.3.3.7-1 acceptable because the applicant clarified that the 10 CFR 54.4(a)(3) license renewal boundaries (i.e., for fire protection) for the instrument air compressor are the indicated ball valves and piping on license renewal drawing LR-STP-IA-80Q119F00048#1-1.</p> <p>In RAI 2.3.3.7-2, dated July 12, 2011, the staff noted on license renewal boundary drawings LR-STP-IA-80Q119F00048#1-1 and LR-STP-IA-80Q119F00048#2-1, coordinates E-5, wet air tanks (80Q111MTS0161, and 80Q112MTS0161) are shown within the scope of license renewal for 10 CFR 54.4(a)(3). However, the relief valves PSV8571 on these tanks are shown as not within the scope of license renewal. Similar air tanks (80Q111MTS0163 and 80Q112MTS0163 at coordinates E/F-2) on these license renewal boundary drawings show the relief valves as</p>

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
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				<p>within the scope of license renewal. The applicant was requested to provide the basis for not including the relief valves on wet air tanks <del>80Q111</del>MTS0161 and <del>80Q112</del>MTS0161 within the scope of license renewal.</p> <p>In its response dated August 9, 2011, the applicant stated that the relief valves PSV8571 on the wet air tanks <del>80Q111</del>MTS0161 and <del>80Q112</del>MTS0161 were inadvertently omitted and should be within the scope of license renewal for 10 CFR 54.4(a)(3). The applicant revised license renewal boundary drawings, LR-STP-IA-<del>80Q119</del>F00048#1-1 and LR-STP-IA-<del>80Q119</del>F00048#2-1, to include the relief valves PSV8571 within scope of license renewal for 10 CFR 54.4(a)(3).</p>
9.	2-48	2.3.3.7.2	In last paragraph on the page in the last sentence, add the letter where the applicant stated the drawings were revised and make editorial correction to drawings number.	<u>By letter dated November 3, 2011</u> , the applicant revised license renewal boundary drawings, LR-STP-IA- <del>80Q119</del> F00048#1-1 and LR-STP-IA- <del>80Q119</del> F00048#2-1, to include the relief valves PSV8571 within scope of license renewal for 10 CFR 54.4(a)(3).
10.	2-49	2.3.3.7.2	Some drawings and component IDs on the page had editorial errors.	In RAI 2.3.3.7-4, dated July 12, 2011, the staff noted that on license renewal drawing LR-STP-IA- <del>80Q119</del> F00048#2-2, coordinates B-6, piping with a capped end, upstream of a 4-in. by 3-in. reducer, was depicted as within the scope of

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
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				<p>license renewal for 10 CFR 54.4(a)(3). However, similar piping on license renewal drawing LR-STP-IA-80Q119F00048#1-2, coordinates B-6, is shown as not being within the scope of license renewal. The applicant was requested to provide a basis for not including the piping on license renewal drawing LR-STP-IA-80Q119F00048#1-2 within the scope of license renewal.</p> <p>In its response dated August 9, 2011, the applicant stated that the piping upstream of the 4-in. by 3-in. reducer on license renewal drawing LR-STP-IA-80Q119F00048#1-2 (coordinates B-6) was inadvertently omitted from, and should be within, the scope of license renewal. The applicant revised license renewal drawing LR-STP-IA-80Q119F00048#1-2 to depict the capped end piping with green highlighting (10 CFR 54.4(a)(3)).</p> <p>Based on its review, the staff finds the applicant's response to RAI 2.3.3.7-4 acceptable because the applicant revised license renewal drawing LR-STP-IA-80Q119F00048#1-2 to depict the capped end piping within the scope of license renewal for 10 CFR 54.4(a)(3).</p>
11.	2-49	2.3.3.7.2	Add reference to letter dated November 3, 2011 to	<u>By letter dated November 3, 2011</u> the applicant

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
			the third paragraph last sentence and the sixth paragraph last sentence.	revised the license renewal drawing to depict the above drain piping excluded from scope of license renewal.  <u>By letter dated November 3, 2011</u> the applicant revised license renewal drawing LR-STP-IA-80119F00048#1-2 to depict the capped end piping with green highlighting (10 CFR 54.4(a)(3)).
12.	2-50	2.3.3.7.2	Make editorial corrections to drawings referenced in first column of table that appears on the page.	LR-STP-IA-80 <u>Q</u> 119F05050#1 and LR-STP-IA-80 <u>Q</u> 119F05050#2 coordinates G/F-2  LR-STP-IA-80 <u>Q</u> 119F05050#1 and LR-STP-IA-80 <u>Q</u> 119F05050#2 coordinates F-2
13.	2-50	2.3.3.7.2	Add reference to letter dated November 3, 2011 to the second paragraph last sentence.	<u>By letter dated November 3, 2011</u> , the applicant also revised the license renewal boundary drawings to clarify the correct scoping boundaries for the piping sections.
14.	2-51	2.3.3.8.2	Add reference to letter dated November 3, 2011 to the third paragraph last sentence.	<u>By letter dated November 3, 2011</u> , the applicant revised license renewal boundary drawings LR-STP-PS-5Z329Z00045#1 and LR-STP-PS-5Z329Z00045#2 to indicate the scoping boundary of the piping and the spatial interaction termination symbol at valve XPS0327.

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15.	2-52	2.3.3.8.2	Add reference to letter dated November 3, 2011 to the first paragraph last sentence and to fourth paragraph last sentence.	<p><u>By letter dated November 3, 2011,</u> the applicant revised license renewal boundary drawings LR-STP-PS-5Z329Z0045#1 and LR-STP-PS-5Z329Z0045#2 to exclude the piping downstream of valves XPS0330 from scope of license renewal and to also remove the SI (spatial interaction) symbol downstream of valve XPS0209.</p> <p><u>By letter dated November 3, 2011,</u> the applicant revised the license renewal boundary drawings LR-STP-PS-5Z329Z0045#1 and LR-STP-PS-5Z329Z0045#2 to indicate the correct scoping boundary of the piping.</p>
16.	2-54	2.3.3.8.2	Add reference to letter dated November 3, 2011 to the seventh paragraph last sentence.	<p><u>By letter dated November 3, 2011,</u> the applicant revised license renewal boundary drawings LR-STP-PS-9Z329Z00047#1 and LR-STP-PS-9Z329Z00047#2 to indicate the correct scoping boundary.</p>
17.	2-63	2.3.3.17.2	For indented paragraph toward bottom of page, correct wording that was in the May 12, 2011 applicant response.	<p>BOP transformers 1D1, 1D2, 2D1, and 2D2 are nonsafety and do not perform any license renewal related function. Therefore, these transformers are not within the scope of license renewal. <del>None is</del> <u>The transformers are not</u> located within 50 feet of a safety-related building. Therefore, fire suppression for the BOP transformers is not within the scope of</p>

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
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				license renewal and is not subject to aging management.
18.	2-64	2.3.3.17.2	Revise the third paragraph to include the reference to letter dated, November 3, 2011.  Reference the license renewal boundary drawing for completeness.	The staff reviewed the applicant's <u>response letter dated November 3, 2011</u> , which confirmed that the fire water suppression system in the lighting DGB shown on <u>license renewal boundary drawing LR-FP-7Q271F00046</u> has been included within the scope of license renewal and is subject to an AMR. Therefore, the staff's concern described in the RAI is resolved.
19.	2-64	2.3.3.17.2	Revise the fifth paragraph to include the reference to letter dated, November 3, 2011. Add a sentence to the end of the paragraph.	<u>By letter dated November 3, 2011, the applicant revised the license renewal boundary drawing to remove Building 15.</u>
20.	2-68	2.3.3.20.2	In the first paragraph, it is believed the SER is referencing some incorrect sections of the STP UFSAR in their review. The LRA references different sections of the UFSAR.	The staff reviewed LRA Section 2.3.3.20, UFSAR Sections <u>9.5.4, 9.5.5, 9.5.6, 9.5.7 and 9.5.8</u> <u>9.3.1.3.2, 9.5.1.2.1, and 9.5.10</u> , and the license renewal boundary drawings using the evaluation methodology discussed in SER Section 2.3 and the guidance in SRP-LR Section 2.3.
21.	2-73	2.3.3.22.2	Add reference to letter dated, November 3, 2011 in the next to the last paragraph, last sentence.	In its response dated August 9, 2011, the applicant stated that license renewal drawing LR-STP-WL-7R309F90001#1 inadvertently omitted the depiction of the piping sections

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				being within the scope of license renewal for 10 CFR 54.4(a)(2). <u>By letter dated November 3, 2011</u> , the applicant revised license renewal drawing LR-STP-WL-7R309F90001#1 to depict the six piping sections and components with red (10 CFR 54.4(a)(2)) highlighting.
22.	2-89	2.4.1.1.1	Modify last sentence to clarify that the vertical tendons are anchored in the gallery.	The <u>vertical U-shaped</u> tendons are anchored in the gallery beneath the base mat.
23.	2-89	2.4.1.1.3	Modify section title and first sentence to address all penetrations.	2.4.1.1.3 <del>Other</del> Penetrations The containment pressure boundary <del>also</del> includes <u>an equipment hatch, a personnel airlock, an auxiliary airlock, and other</u> penetrations such as the electrical penetrations, the piping penetrations, and the fuel transfer tube.
24.	2-91	2.4.2.1	Edit 1 <sup>st</sup> sentence to clarify that control room is not an independent structure.	In LRA Section 2.4.2, the applicant described the control room as <u>physically located in the MEAB</u> , which is a multistory, structural steel, and reinforced concrete structure <del>that is physically located in the MEAB.</del>
25.	2-97	2.4.8.1	Clarify first sentence in this section.	In LRA Section 2.4.8, the applicant described the FHB as a multistory, structural steel, and reinforced concrete structure that is supported on a reinforced concrete basemat <del>foundation composed of</del> <u>founded on</u> structural backfill in

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
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				some areas and in-situ soil in the remaining areas.
26.	3-1	3	Second paragraph of Introduction states Appendix B of the LRA describes 40 AMPs. By letter dated November 30, 2011 (ML11335A140), a 41 <sup>st</sup> AMP was added to monitor and maintain protective coatings. Note that Table 3.0-1 lists the 41 aging management programs	Revise sentence to indicate Appendix B of the LRA describes 41 AMPs.
27.	3-6	3.0.2.2.1	In the second sentence of the second paragraph, reference is made to an incorrect LRA table.	Revised to read: "Report item for exposure to "air-indoor uncontrolled." The applicant made the associated changes to LRA Tables 3.3.2-4, 3.3.2-17, 3.3.2-19, 3.3.2-20, and 3.3.2-21 for aluminum components and LRA Table 3.3.2- <del>4727</del> for carbon steel components."
28.	3-14	3.0.3.1.2	First paragraph of Staff Evaluation refers to an incorrect NRC Commission Order.	Revise to read: "Staff Evaluation. The staff reviewed the applicant's claim of consistency with the GALL Report by considering Revisions 1 and 2 of the GALL Report along with Commission Order <del>EA-03-0039</del> <u>ES-03-009</u> , ASME Code cases,
29.	3-27	3.0.3.1.6	The Masonry Wall Program is currently implemented. In 2 <sup>nd</sup> paragraph under UFSAR Supplement, the Masonry Wall Program will be	Revise to read: "The staff also notes that by letter dated October 10, 2011, the applicant committed

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			enhanced prior to PEO instead of implemented.	(Commitment No. 36) to <del>implement</del> <u>enhance</u> the Masonry Wall Program prior to entering the period of extended operation."
30.	3-44	3.0.3.2.2	First sentence on page 3-44 refers to and incorrect RAI number.	The sentence should read "By letter dated March 21, 2012, the staff issued RAI B2.1.3-4b <u>2b</u> requesting that the applicant justify the adequacy of the proposed inspection schedule."
31.	3-44	3.0.3.2.2	The last sentence in the second paragraph on page 3-44 refers to an incorrect RAI number.	The sentence should read "The staff's concern regarding the inspection schedule described in RAI B2.1.3-4b <u>2b</u> is resolved."
32.	3-49	3.0.3.2.2	In the second sentence of the 4 <sup>th</sup> paragraph on page 3-49 refers to an incorrect letter date.	The sentence should read "By letter dated March <del>28</del> <u>21</u> , 2012, the staff issued RAI B2.1.3-2b....."
33.	3-63	3.0.3.2.6	In the last sentence of the 4 <sup>th</sup> paragraph of the Staff Evaluation section refers to an incorrect letter date.	The sentence should read "In order to resolve this concern, by letter dated February <del>27</del> <u>28</u> , 2012, the staff issued RAI B2.1.9-1a requesting...."
34.	3-121	3.0.3.2.18	In addition to reference in 5 <sup>th</sup> sentence in paragraph that starts on previous page, a letter dated December 7, 2011 (NOC-AE-11002769) (ML11347A365) states that adding the fire water storage tank using a volumetric inspection of the	Revise 5 <sup>th</sup> sentence in paragraph that starts on previous page to read:  "In a follow up response dated November 4,

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			tank bottoms within 5 years prior to entering the period of extended operation and whenever the tanks are drained.	2011, <u>and in LRA Supplement dated December 7, 2011</u> , the applicant's letters amended LRA Section A.1.22 and B2.1.22, deleting external elastomers from the scope and adding the fire water storage tank using a volumetric inspection of the tank bottoms within 5 years prior to entering the period of extended operation and whenever the tanks are drained to manage for loss of material."
35.	3-124	3.0.3.2.18	The 3 <sup>rd</sup> sentence in the fourth paragraph on the page refers to an incorrect letter date for issuing RAI B2.1.22-5.	Revise sentence to read:  "By letter dated <del>September 15</del> <u>August 15</u> , 2011, the staff issued RAI B2.1.22-5 requesting that the applicant <u>Revise</u> LRA Table A4-1....."
36.	3-124	3.0.3.2.18	The 2 <sup>nd</sup> sentence in the fifth paragraph on the page misstates the name of the aging management program.	Revise the sentence to read:  "The applicant also stated that, in a response dated August 18, 2011, LRA Amendment 3 stated that future operating experience will be reviewed to confirm the effectiveness of the <u>One Time Inspection Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program</u> ."
37.	3-176	3.0.3.2.27	In the last sentence of the 4 <sup>th</sup> paragraph on the page, the edition date for ACI 349.3R is incorrect.	Revise the sentence to read:  "All deficiencies identified to date have been evaluated, and none were noted as being greater in size than a hairline crack, which fall

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
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				into the first-tier categorization specified in ACI <del>349.3R-69</del> <u>ACI 349.3R-96.</u> "
38.	3-178	3.0.3.2.28	In the last sentence of the fifth paragraph on the page, a reference is made to an incorrect letter date..	Revise the sentence to read:  "By letter dated October <del>45</del> <u>11</u> , 2011, the staff issued RAI B3.1-5a (followup) requesting that the applicant revise LRA Section B3.1 and LRA Section A2.1, consistent with the additional commitment discussed in the response to RAI B3.1-5."
39.	3-189	3.0.3.3.1	In the 3 <sup>rd</sup> paragraph under Staff Evaluation, a reference to 10 CFR is incorrect.	Revise paragraph to read:  "Based on the acceptability of the applicant's AMPs to manage water chemistry and inservice inspection (evaluated elsewhere in this SER), its compliance with existing regulations concerning augmented inspections (10 CFR 50.55a(g)(6)(ii)(E)(1) and 10 CFR 50.55a(g)(6)(ii)( <del>E</del> )( <u>F</u> )(1)) and the fact that Revision 2 of the GALL Report does not recommend any further aging management activities, the staff finds elements one through six of the applicant's AMP acceptable."
40.	3-193	3.0.3.3.2	For Corrective Actions, corrective action number (2) references the incorrect document.	Corrective action number (2) should read:  "Engineering evaluation that demonstrates the acceptability of a detected condition <u>consistent with WCAP-17096-NP</u> ( <del>Section 6.0 of MRP</del> )"

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				<del>227</del> );”
41.	3-297	Table 3.2-1	For line item 3.2.1.50, add SE Section 3.2.2.1.4	For column “Staff Evaluation”, add following to read:  Consistent with the GALL Report.  ( <u>SER Section 3.2.2.1.4</u> )
42.	3-300	3.2.2.1.1	In first sentence, revise reference to item “3.2.1.18” to “3.2.1.17”.	For LRA Table 3.2.1, items 3.2.1.5, 3.2.1.11, 3.2.1.13, 3.2.1.14, 3.2.1.48 <del>17</del> through 3.2.1.20, and 3.2.1.34, the applicant claimed that the corresponding AMR items in the GALL Report are not applicable because the associated items are only applicable to BWRs.
43.	3-305	3.2.2.1.4	In first sentence of second paragraph, date of referenced letter is incorrect.	In its response dated November <del>2221</del> , 2011, the applicant revised the AMR item in LRA Table 3.3.2-17 for carbon steel valves exposed to fuel oil to specify that this component will be managed for loss of material by the Fuel Oil Chemistry and One-Time Inspection programs.
44.	3-321	Table 3.3-1	For line item 3.3.1.24, add reference to SER Section 3.3.2.2.10 Item 2.	For column “Staff Evaluation”, add following to read:  Not applicable to PWRs  <u>SER Section 3.3.2.1.1 and 3.3.2.2.10 Item 2)</u>
45.	3-249	Table 3.1-1	For line item 3.1.1.68, the staff evaluation column refers to SE Section 3.1.2.1.4. SE Section	For column “Staff Evaluation”, revise to read:

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			3.1.2.1.4 does not reference Table 3.1-1 Item 3.1.1.68. Suggest removing the reference to SER Section 3.1.2.1.4.	Consistent with the GALL Report ( <del>SER Section 3.1.2.1.4</del> )
46.	3-251	Table 3.1-1	For line item 3.1.1.81, the staff evaluation column refers to SE Section 3.1.2.1.7. SE Section 3.1.2.1.7 does not reference Table 3.1-1 Item 3.1.1.81. Suggest removing the reference to SER Section 3.1.2.1.7.	For column "Staff Evaluation", revise to read: Consistent with the GALL Report ( <del>SER Section 3.1.2.1.7</del> )
47.	3-411	Table 3.4-1 (3.4.1.25)	For line item 3.4.1.25, there is no SER Section 3.4.2.3.7.	Remove reference to SER Section 3.4.2.3.7 in the Staff Evaluation column. Consistent with the GALL Report ( <del>SER Section 3.4.2.3.7</del> )
48.	3-415	3.4.2.1	The following programs were added to the aging management of Steam and Power Conversion Systems.  Boric Acid Corrosion program was added in letter dated January 18, 2012 (NOC-AE-12002779) (ML12020A072)  Selective Leaching of Materials was added in letter dated November 30, 2011 NOC-AE-12002758. (ML11335A140)	Revise to read:  LRA Section 3.4.2.1 identifies the materials, environments, AERMs, and the following programs that manage aging effects for the steam and power conversion system components:  <ul style="list-style-type: none"> <li>• Bolting Integrity</li> <li>• <u>Boric Acid Corrosion</u></li> <li>• Buried Piping and Tanks Inspection</li> <li>• External Surfaces Monitoring Program</li> </ul>

No.	SER Location		Comment	Suggested Resolution  (suggested text is shown by underlining/strikethrough formatting)
	Page	Section		
				<ul style="list-style-type: none"> <li>• Flow-Accelerated Corrosion</li> <li>• Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components</li> <li>• Lubricating Oil Analysis</li> <li>• One-Time Inspection</li> <li>• <u>Selective Leaching of Materials</u></li> <li>• Water Chemistry</li> </ul>
49.	3-474	3.5.2.2.2	In the second sentence of the 1st paragraph in section (8) on the page, SRP-LR Section 3.5.2.2.2.1 does not have an item 8. The info addressed is in an unnumbered paragraph.	Revise sentence to read: “The criteria in SRP-LR Section 3.5.2.2.2.1, <del>item 8</del> , state that lock up...”
50.	3-475	3.5.2.2.2	In the first sentence and second sentences of the last paragraph in section (8) that starts on the previous page, SRP-LR Section 3.5.2.2.2.1 does not have an item 8. The info addressed is in an unnumbered paragraph.	Revise sentences to read: “Based on the programs identified, the staff determines that the applicant’s programs meet the further evaluation criteria of SRP-LR Section 3.5.2.2.2.1, <del>item 8</del> .” “For those items that apply to LRA Section 3.5.2.2.2.1-8, the staff concludes...”
51.	3-485	3.5.2.2.2	In the 1 <sup>st</sup> sentence in the 1 <sup>st</sup> paragraph in section (1), LRA Section number should be 3.5.2.2.2.6.	Revise sentence to read:

No.	SER Location		Comment	Suggested Resolution (suggested text is shown by underlining/strikethrough formatting)
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				"LRA Section 3.5.2.2.2.6-1, associated with LRA Table 3.5.1, item 3.5.1.39..."
52.	3-485	3.5.2.2.2	In the 2 <sup>nd</sup> sentence in the 3 <sup>rd</sup> paragraph in section (1), LRA Section number should be 3.5.2.2.2.6.	Revise sentence to read: "For those items that apply to LRA Section 3.5.2.2.2.6-1, the staff concludes..."
53.	3-486	3.5.2.2.2	In the 1 <sup>st</sup> sentence in the 1 <sup>st</sup> paragraph in section (2), LRA Section number should be 3.5.2.2.2.6.	Revise sentence to read: "LRA Section 3.5.2.2.2.6-2, associated with LRA Table 3.5.1, item 3.5.1.39..."
54.	3-486	3.5.2.2.2	In the 2 <sup>nd</sup> sentence in the 3 <sup>rd</sup> paragraph in section (2), LRA Section number should be 3.5.2.2.2.6.	Revise sentence to read: "For those items that apply to LRA Section 3.5.2.2.2.6-2, the staff concludes..."
55.	4-34	4.2.4.2	In the fourth paragraph, the RAI number is incorrectly referenced. See NRC letter dated June 25, 2012 (ML12144A443)	Revise to read: "By letter dated June 25, 2012, the staff issued RAI <del>4.2.4-1</del> <u>4.2.2.4-1</u> , requesting that the applicant address this issue as it relates to its P-T curve methodology and explain how it will manage its P-T limit curves during the period of extended operation."
56.	4-107	4.5.2	In the first paragraph, the incorrect section of 10 CFR 54.21 is referenced.	Revise to read: "The staff reviewed LRA Section 4.5 and the concrete containment tendon prestress TLAA

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				to confirm, pursuant to 10 CFR 54.21(c)(1)(ii)(iii) that the <u>intended functions will be adequately managed for analyses have been projected to the end of the period of extended operation.</u>
57.	B-2	Appendix B	Letter not listed	Add:  Document Date: 4/14/2011  Letter to Powell, G. T., STPNOC, "Requests for Additional Information for the Review of the South Texas Project, License Renewal Application – Fire Protection and Component Integrity" (ADAMS Accession No. ML110830978)
58.	B-3	Appendix B	Letter not listed	Add:  Document Date: 8/4/2011  Letter to Powell, G. T., STPNOC, "Requests for Additional Information for the Review of the South Texas Project, License Renewal Application" (ADAMS Accession No. ML11201A062)
59.	B-6	Appendix B	Letter not listed	Add:  Document Date: 11/30/2011  Letter from Rencurrel, D.W., STPNOC, "Annual Update to the South Texas Project License

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				Renewal Application" (ADAMS Accession No. ML11335A140)
60.	B-7	Appendix B	Letter not listed	Add:  Document Date: 2/15/2012  Letter to Rencurrel, D.W., STPNOC, "Requests for Additional Information for the Review of the South Texas Project, Units 1 and 2, License Renewal Application – Aging Management, Set 13 (TAC Nos. ME4936 and ME4937)" (ADAMS Accession No. ML12039A240)
61.	B-8	Appendix B	Letter not listed	Add:  Document Date: 03/28/2012  Letter from Rencurrel, D.W., STPNOC, "Supplement to the Response to Requests for Additional Information for the South Texas Project License Renewal Application Aging Management Program, Set 12" (ADAMS Accession No. ML12097A063)
62.	B-9	Appendix B	Letter not listed	Add:  Document Date: 05/03/2012  Letter from Richards, Kevin D., STPNOC, "Response to Requests for Additional Information (RAI) 3.3.2.2.12.2-1 for the South Texas Project License Renewal Application"

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				(ADAMS Accession No. ML12135A224)
63.	B-9	Appendix B	Letter not listed	Add:  Document Date: 05/10/2012  Letter from Rencurrel, D.W., STPNOC, "Response to Requests for Additional Information (RAI) B2.1.9-3 (Supplement) for the South Texas Project License Renewal Application" (ADAMS Accession No. ML12138A065)
64.	B-9	Appendix B	Letter not listed	Add:  Document Date: 05/14/2012  Letter from Rencurrel, D.W., STPNOC, "Response to Requests for Additional Information (RAI) B3.2.2.1-1a for the South Texas Project License Renewal Application" (ADAMS Accession No. ML12139A131)
65.	B-9	Appendix B	Letter not listed	Add:  Document Date: 5/14/2012  Letter to Rencurrel, D.W., STPNOC, "Requests for Additional Information for the Review of the South Texas Project, Units 1 and 2, License Renewal Application – Aging Management, Set 18 (TAC Nos. ME4936 and ME4937)" (ADAMS

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				Accession No. ML12124A094)
66.	B-10	Appendix B	Letter not listed	Add: Document Date: 06/14/2012 Letter from Rencurrel, D.W., STPNOC, "Response to Requests for Additional Information (RAI) B1.4-3 for the South Texas Project License Renewal Application" (ADAMS Accession No. ML12174A340)