

August 14, 2014

MEMORANDUM TO: Samuel Lee, Chief
Licensing Branch 2
Division of New Reactor Licensing
Office of New Reactors

FROM: Luis Betancourt, Project Manager **/RA Luis Betancourt for/**
Licensing Branch 2
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: AUDIT PLAN FOR THE NUCLEAR INNOVATION NORTH AMERICA,
LLC, COMBINED LICENSE APPLICATION CHAPTER 1E,
FUKUSHIMA MITIGATION STRATEGIES RECOMMENDATION 4.2
(MAAP CALCULATIONS)

On September 20, 2007, South Texas Project Nuclear Operating Company submitted to the U.S. Nuclear Regulatory Commission (NRC), a Combined License Application Final Safety Analysis Report (FSAR) to construct and operate two additional units (Units 3 and 4) based on the United States - Advanced Boiling Water Reactor Certified Design Control Documents at the South Texas Project Nuclear Power Plant site located in the county of Matagorda near Bay City, Texas. On January 24, 2011, Nuclear Innovation North America became the primary applicant for the license for these two units. The NRC staff has identified a need to audit the Modular Accident Analysis Program (MAAP) analysis results in support of the Fukushima Mitigation Strategies Recommendation 4.2. The audit will take place at the Westinghouse Twinbrook office in Rockville, Maryland on August 20, 2014. A copy of the audit plan is enclosed.

Docket Nos.: 52-012 and 52-013

Enclosure:
Audit Plan

cc w/encl: See next page

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via email*

NRO-002

OFFICE	DNRL/LB2: PM	DNRL/LB2: LA*	DSRA/SRSB: TR	DNRL/LB2: PM
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DATE	08/13/2014	08/14/2014	08/14/2014	08/14/2014

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**SOUTH TEXAS PROJECT FINAL SAFETY ANALYSIS REPORT
CHAPTER 1E, FUKUSHIMA MITIGATION STRATEGIES RECOMMENDATION 4.2
(MAAP CALCULATIONS) AUDIT PLAN**

August 20, 2014

**NUCLEAR INNOVATION NORTH AMERICA, LLC.
Docket Nos. 52-012 and 52-013**

Location: Westinghouse Office
12300 Twinbrook Parkway, Suite 150
Rockville, MD 20852

Applicant Contact: Scott Head
James Tomkins

Purpose:

The purpose of the audit is to verify that the Modular Accident Analysis Program (MAAP) analysis results and other supporting document developed by Nuclear Innovation North America, LLC. (NINA) address the issues described in Interim Staff Guidance (ISG) JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (ML12229A174) dated August 29, 2012, that endorses the Nuclear Energy Institute (NEI) 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide (ML12242A378).

This audit follows the guidelines in Office of New Reactors (NRO) Office Instruction NRO-REG-108 (Revision 0), "Regulatory Audits."

Background and Audit Basis:

On September 20, 2007, South Texas Project (STP) Nuclear Operating Company submitted to the U.S. Nuclear Regulatory Commission (NRC), a Combined License Application Final Safety Analysis Report to construct and operate two additional units (Units 3 and 4) based on the United States - Advanced Boiling Water Reactor Certified Design Control Documents at the South Texas Project Nuclear Power Plant site located in the county of Matagorda near Bay City, Texas. On January 24, 2011, NINA became the primary applicant for the license for these two units.

The applicant submitted its COLA for Chapter 1E, "Fukushima Mitigative Strategies Recommendation 4.2," by letters, dated June 25, 2012 (ML121850710) and December 6, 2012 (ML12346A445). The NRC staff has identified a need to audit the Modular Accident Analysis Program (MAAP) analysis results to address Fukushima Near-term Task Force Recommendation 4.2 (ML121230021) regarding mitigation strategies. The audit will take place at the Westinghouse office in Rockville, Maryland, on August 20, 2014.

Enclosure

Regulatory Audit Scope:

The primary scope of this audit is the review of design calculation and other supporting documents that form the basis of the applicant's Mitigative Strategies FLEX Integrated Plan.

Audit Team:

The NRC staff from the Reactor Systems, Nuclear Performance & Code Review Branch (SRSB) will comprise the audit team.

- James Gilmer, Technical Reviewer, NRO/DSRA/SRSB
- Luis Betancourt, Project Manager, NRO/DNRL/LB2

Staff from NINA will include:

- James Tomkins

Information and Other Materials Necessary for the Audit:

Documentation including a detailed report, and supporting MAAP calculations and analysis to support the applicant's Mitigative Strategies FLEX Integrated Plan.

Logistics:

The NRC staff and the applicant have agreed that the audit will be conducted in the Westinghouse office in Rockville, Maryland. In support of this approach, the applicant has agreed to make knowledgeable staff available to discuss preliminary audit findings in the audit. The staff requests that the applicant confirm the primary and supporting documents prior to the audit.

The audit is tentatively scheduled for August 20, 2014, between 9:00 a.m. and 12:00 p.m., concluding with an exit teleconference at 11:30 a.m., to provide the applicant with the summary of the preliminary audit findings. The NRC staff will have an internal meeting between 11:00 a.m. through 11:30 a.m. to summarize the preliminary findings.

Deliverables:

A summary report of the audit will be prepared and issued in accordance with NRO-REG-108 within 45 days following completion of the audit.

References:

1. NRO Office Instruction NRO-REG-108 (Revision 0), "Regulatory Audits."
2. 10 CFR 50, Appendix A, General design Criteria 17, "Electric Power System."

Docket Nos. 52-012 and 52-013

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(Revised 06/03/2014)

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