



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

July 21, 2015

**LICENSEE:** STP Nuclear Operating Company

**FACILITY:** South Texas Project, Units 1 and 2

**SUBJECT:** SUMMARY OF MAY 6, 2015, PUBLIC MEETING WITH STP NUCLEAR OPERATING COMPANY TO DISCUSS THE LICENSE AMENDMENT AND EXEMPTION REQUESTS TO USE A RISK-INFORMED APPROACH TO THE RESOLUTION OF GENERIC SAFETY ISSUE 191, "ASSESSMENT OF DEBRIS ACCUMULATION ON PWR SUMP PERFORMANCE" (TAC NOS. MF2400, MF2401, MF2402, MF2403, MF2404, MF2405, MF2406, MF2407, MF2408, AND MF2409)

On May 6, 2015, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of STP Nuclear Operating Company (STPNOC, the licensee), at NRC Headquarters, Rockville, Maryland. The meeting notice and agenda, dated February 13, 2015, are located in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML15091A578. The licensee's handouts from the meeting are available in ADAMS at Accession Nos. ML15119A327 and ML15119A326. A list of meeting attendees is provided in the Enclosure to this meeting summary.

By letter dated June 19, 2013 (ADAMS Accession No. ML131750250), as supplemented by letters dated October 3, October 31, November 13, November 21, and December 23, 2013 (two letters); and January 9, February 13, February 27, March 17, March 18, May 15 (two letters), May 22, June 25, and July 15, 2014, March 10, and March 25, 2015 (ADAMS Accession Nos. ML13295A222, ML13323A673, ML13323A128, ML13338A165, ML14015A312, ML14015A311, ML14029A533, ML14052A053, ML14072A076, ML14086A383, ML14087A126, ML14149A353, ML14149A354, ML14149A434, ML14178A481, ML14202A045, ML15072A092, and ML15091A440, respectively), STPNOC submitted exemption requests accompanied by a license amendment request (LAR) for a risk-informed approach to resolve Generic Safety Issue (GSI)-191, "Assessment of Debris Accumulation on PWR [Pressurized-Water Reactor] Sump Performance," at South Texas Project, Units 1 and 2 (STP).

The purpose of this public teleconference call was to discuss the licensee's proposed structure of the methodology change submittal which the licensee plans to provide to the staff in June 2015. The June 2015 supplement will provide information on the new Risk over Deterministic methodology, and modify the license amendment requests and exemptions. Another purpose was to provide NRC staff feedback on the request for additional information (RAI) response received from STPNOC by letter dated March 25, 2015.

**Meeting Summary**

The NRC and STPNOC staff continued a discussion from the April 22, 2015, public meeting (meeting summary at ADAMS Accession No. ML15177A104) with the licensee concerning the

impacts of requirements in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.67, "Accident source term," and the 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 19, "Control room" on the resolution of GSI-191 for STP. The NRC staff considered the licensee's discussion regarding the criteria it may choose in responding to this RAI.

The NRC staff provided feedback on the draft Section 4.3.2 Sensitivity Study on fiber penetration of the strainer provided by STPNOC (ADAMS Accession No. ML15111A058). The NRC staff noted that the sensitivity results appeared consistent with independent calculations performed by the NRC contractor; however, the staff may have some questions on the filtration modeling and the methodology used to address long-term shedding of fiber from the debris bed.

The NRC staff had no comments on draft Section 5.5 *ΔLERF [change in Large Early Release Frequency]* provided by STPNOC (ADAMS Accession No. ML15111A056).

The NRC staff questioned which computer codes the licensee would use for the mass and energy release, short- and long-term containment response and heat removal analyses in the forthcoming submittal. In the previous submittal, the licensee stated that RELAP and MELCOR codes were used. The current licensing basis information provided in the Updated Final Safety Analysis Report provides the containment response analysis as using CONTEMPT code. The licensee stated that it would answer this question in a future meeting. The NRC staff stated that this information would need to be clarified on the docket, as well.

The need for a technical specification (TS) change was discussed. The licensee stated that operability would be based on deterministic values for containment debris loading and that it does not expect to change TSs to resolve NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (ADAMS Accession No. ML042360586). The NRC staff suggested that further internal discussions would be needed regarding operability.

The NRC staff provided specific items for discussion during the May 11, 2015, audit at the University of New Mexico (the draft audit plan was sent to the licensee by e-mail; it is at ADAMS Accession No. ML15110A463):

- Fixed filtration versus time dependent
- Split fraction based on generic testing
- The amount of margin to tested debris values
- LERF and use of Quality Assurance program

The NRC staff did not comment on the licensee's handouts and suggested that this would be a topic for a future public meeting.

### **Action Items**

Future topics of discussion during biweekly conference calls:

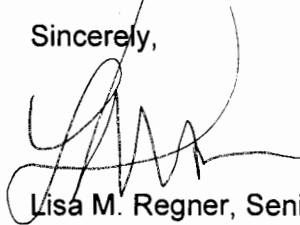
- CASA Grande white paper revisions
- Draft Sections 4.3.2 and 5.5
- ΔLERF

- Follow-up containment analysis questions
- Thermal-hydraulics discussion

No Public Meeting Feedback Forms or public comments were received for this meeting.

Please direct any inquiries to me at 301-415-1906, or [lisa.regner@nrc.gov](mailto:lisa.regner@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa M. Regner', with a large, sweeping flourish at the end.

Lisa M. Regner, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

MAY 6, 2015, CONFERENCE CALL WITH STP NUCLEAR OPERATING COMPANY

REGARDING RISK-INFORMED APPROACH TO RESOLUTION OF GSI-191

SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

NAME	ORGANIZATION
Lisa Regner	U.S. Nuclear Regulatory Commission (NRC)
John Stang	NRC
Victor Cusumano	NRC
Caroline Tilton	NRC
Jerry Dozier	NRC
Ahsan Salman	NRC
Steve Smith	NRC
Paul Klein	NRC
Steve Laur	NRC
Mike Murray	STP Nuclear Operating Company (STPNOC)
Steve Blossom	STPNOC
Drew Richards	STPNOC
Ernie Kee	STPNOC
Wayne Harrison	STPNOC
Wes Schulz	STPNOC
Linda Dyer	STPNOC
Bruce Letellier	Alion Science and Technology
Steven M Unikewicz	Alion Science and Technology
Dave Johnson	ABS Consulting
Don Wakefield	ABS Consulting
Ron Holloway	Wolf Creek Nuclear Generating Corporation
Jeremy Tejada	University of Texas at Austin
Paul Leonard	Enercon
Seyed Reihani	University
Phillip Grissom	Southern Nuclear

Enclosure

- Follow-up containment analysis questions
- Thermal-hydraulics discussion

No Public Meeting Feedback Forms or public comments were received for this meeting.

Please direct any inquiries to me at 301-415-1906, or [lisa.regner@nrc.gov](mailto:lisa.regner@nrc.gov).

Sincerely,

**/RA/**

Lisa M. Regner, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
List of Attendees

cc w/encl: Distribution via Listserv

**DISTRIBUTION:**

PUBLIC

LPL4-1 r/f

RidsAcrsAcnw\_MailCTR Resource

RidsNrrDeEpn Resource

RidsNrrDeEsGb Resource

RidsNrrDorLpl4-1 Resource

RidsNrrDraApla Resource

RidsNrrDssScvb Resource

RidsNrrDssSnpb Resource

RidsNrrDssSrx Resource

RidsNrrDssSsib Resource

RidsNrrDssStsb Resource

RidsNrrLAJBurkhardt Resource

RidsNrrPMSouthTexas Resource

RidsRgn4MailCenter Resource

MWaters, EDO RIV

TWertz, NRR

SSmith, NRR/DSS/SSIB

PKlein, NRR/DE/ESGB

MYoder, NRR/DE/ESGB

VCusumano, NRR/DSS/SSIB

AGuzzetta, NRR/DSS/SRXB

CFong, NRR/DRA/APLA

JStang, NRR/DSS/SSIB

DBoirel, NRR/DSS/SSIB

SLaur, NRR/DRA/APLA

MBanks, ACRS

RElliott, NRR/DSS/STSB

KWest, NRR/DSS/STSB

ASallman, NRR/DSS/SCVB

Tsao, NRR/DE/EPNB

LWard, NRR/DSS/SNPB

**ADAMS Accession No.: ML15177A274**

**\* by email**

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/LA	NRR/DSS/SSIB/BC*	NRR/DRA/ARCB/BC*	
NAME	LRegner	JBurkhardt	VCusumano	UShoop	
DATE	6/26/15	6/29/15	7/8/15	7/15/15	
OFFICE	NRR/DRA/APLA/BC*	NRR/DE/ESGB/BC*	NRR/DSS/STSB/BC*	NRR/DORL/LPL4-1/BC	NRR/DORL/LPL4-1/PM
NAME	SRosenberg	GKulesa	RElliott	MMarkley	LRegner
DATE	7/8/15	7/10/15	7/8/15	7/21/15	7/21/15

**OFFICIAL RECORD COPY**