



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

December 17, 2015  
NOC-AE-15003321

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

South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
STP Nuclear Operating Company Commitment to  
Maintain Severe Accident Management Guidelines

The Nuclear Energy Institute (NEI) Nuclear Strategic Issues Advisory Committee (NSIAC) recently approved an Industry Initiative to implement and maintain Severe Accident Management Guidelines (SAMGs). This letter establishes commitments related to SAMGs for STP Nuclear Operating Company (STPNOC). These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in Emergency Operating Procedures (EOPs). SAMG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases.

It is expected that NRC staff personnel will conduct periodic inspection of our SAMGs and if any performance deficiencies are identified, they will be assessed using the Reactor Oversight Process. We also understand that inspection activities will not extend to NRC review and approval of SAMG strategies, or the use of equipment described in the SAMGs.

Commitments for SAMGs are listed in Attachment 1.

If there are any questions regarding this letter, please contact Wendy Brost at (361) 972-8516 or me at (361) 972-7566.

G. T. Powell  
Site Vice President

web

Attachment: List of Regulatory Commitments

ADD1

STI: 34253718

cc:  
(paper copy)

(electronic copy)

Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Morgan, Lewis & Bockius LLP  
Steve Frantz, Esquire

Lisa M. Regner  
Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North (MS 08 HO4)  
11555 Rockville Pike  
Rockville, MD 20852

U. S. Nuclear Regulatory Commission  
Lisa M. Regner

NRC Resident Inspector  
U. S. Nuclear Regulatory Commission  
P. O. Box 289, Mail Code: MN116  
Wadsworth, TX 77483

NRG South Texas LP  
John Ragan  
Chris O'Hara  
Jim von Suskil

William Dean  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
One White Flint North (MS 13 H 16)  
11555 Rockville Pike  
Rockville, MD 20852

City Public Service  
Kevin Pollo  
Cris Eugster  
L.D. Blaylock

Crain Caton & James, P.C.  
Peter Nemeth

City of Austin  
C. Mele  
John Wester

Texas Dept. of State Health Services  
Richard A. Ratliff  
Robert Free

**List of Regulatory Commitments**

The following table identifies those actions committed to by STPNOC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

| <b>Commitment</b>  | <b>Scheduled Completion Date</b>   | <b>Condition Report Action Number</b> |
|--|--|---------------------------------------|
| <p>STPNOC will consider the site SAMGs within plant configuration management processes in order to ensure that the SAMGs reflect changes to the facility over time</p>   | <p>October 31, 2016</p>  | <p>15-24070-2</p>                     |
| <p>STPNOC will update the site SAMGs to future revisions of the PWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, <i>Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents</i>.</p> | <p>Within two refueling outages or three years of the publication date of the guidelines, whichever is greater</p> | <p>15-24070-3</p>                     |