

## **NRR-PMDAPEm Resource**

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**From:** Regner, Lisa  
**Sent:** Monday, June 06, 2016 3:58 PM  
**To:** Drew Richards (amrichards@STPEGS.COM); Lance Sterling (lsterling@stpegs.com)  
**Cc:** Regner, Lisa  
**Subject:** CRDM LAR Audit Plan  
**Attachments:** MF7577 Info Audit Plan.docx

Drew, Lance,

Attached is the draft Audit Plan for the CRDM D-6 LAR Audit on June 28-30.  
Ian Tseng likely will not attend, but a BC may take his place (either Jeremy Dean or Eric Oesterle).

Let me know when you'd like to have a call for this. Wednesday afternoon is the only good day for me this week or we can look at next week.

Lisa

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2886

**Mail Envelope Properties** (fd6aa7d51b7a4985b57c430d7230bcc2)

**Subject:** CRDM LAR Audit Plan  
**Sent Date:** 6/6/2016 3:58:21 PM  
**Received Date:** 6/6/2016 3:58:22 PM  
**From:** Regner, Lisa

**Created By:** Lisa.Regner@nrc.gov

**Recipients:**

"Regner, Lisa" <Lisa.Regner@nrc.gov>

Tracking Status: None

"Drew Richards (amrichards@STPEGS.COM)" <amrichards@STPEGS.COM>

Tracking Status: None

"Lance Sterling (lsterling@stpegs.com)" <lsterling@stpegs.com>

Tracking Status: None

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MF7577 Info Audit Plan.docx	316337	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Mr. James Connolly  
Site Vice President  
South Texas Project Nuclear Operating Company  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT UNIT 1 (STP) – PLAN FOR THE REGULATORY  
AUDIT REGARDING LICENSE AMENDMENT REQUEST TO REVISE  
TECHNICAL SPECIFICATION 5.3.2 TO ALLOW OPERATION WITH 56 FULL-  
LENGTH CONTROL ROD ASSEMBLIES FOR UNIT 1 (CAC NO. MF7577)

Dear Mr. Connolly:

By letter dated April 7th, 2016 (Agencywide Documents Access and Management System Accession No. ML16110A297), as supplemented by letter dated MONTH, DATE, YEAR (MLXXXXXXXX), South Texas Project Nuclear Operating Company, the licensee for South Texas Project Unit 1, requests to revise the licensing bases to allow operation with 56 full-length control rod assemblies.

The NRC staff has determined that a regulatory audit of the South Texas Project Unit 1 LAR should be conducted in accordance with the NRR Office Instruction LIC-111, "Regulatory Audits," for the NRC staff to gain a better understanding of the licensee's supporting calculations and bases documents for the LAR.

A regulatory audit is a planned, license or regulation-related activity that includes the examination and evaluation of primarily non-docketed information. A regulatory audit is conducted with the intent to gain understanding, to verify information, and/or to identify information that will require docketing to support the basis of the licensing or regulatory decision. Performing a regulatory audit of the licensee's information is expected to assist the NRC staff in efficiently conducting its technical review or gain insights on the licensee's processes or procedures. Information that the NRC staff relies upon to make the safety determination must be submitted on the docket. However, there may be supporting information retained as records under 10 CFR 50.71 maintenance of records, making of reports and/or 10 CFR 54.37 additional records and record-keeping requirements that, although not required to be submitted as part of the licensing action, would help the NRC staff better understand the licensee's submitted information.

J. Connolly

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If you have any questions, please contact me by telephone at 301-415-1906 or by e-mail at [lisa.regner@nrc.gov](mailto:lisa.regner@nrc.gov).

Sincerely,

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

Docket Nos. 50-498

Enclosure: Audit Plan

cc w/encl: Distribution via Listserv

J. Connolly

- 2 -

If you have any questions, please contact me by telephone at 301-415-1906 or by e-mail at [lisa.regner@nrc.gov](mailto:lisa.regner@nrc.gov).

Sincerely,

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

Docket Nos. 50-498

Enclosure: Audit Plan

cc w/encl: Distribution via Listserv

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**ADAMS Accession No: MLXXXXXXXXXX**

OFFICE	DORL/LPLIV-1/PM	DORL/LPLIV-1/LA	DSS/SRXB/BC	DORL/LPLIV-1/BC	DSS/SNPB/BC
NAME	LRegner	JBurkhardt	EOesterle	RPascarelli	JDean
DATE					

**OFFICIAL RECORD COPY**



## **Audit Plan**

# **South Texas Project Unit 1 License Amendment Request Allowance of Operation with 56 Full-Length Control Rod Assemblies**

**Audit Date: June 28<sup>th</sup> – June 30<sup>th</sup>, 2016**

**Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission**

Enclosure

## **Audit Plan South Texas Project Unit 1**

### **1. Background**

By letter dated April 7th, 2016 (Agencywide Documents Access and Management System Accession No. ML16110A297), as supplemented by letter dated MONTH, DATE, YEAR (MLXXXXXXXX), South Texas Project Nuclear Operating Company (STPNOC), submitted a license amendment request (LAR) for South Texas Project, Unit 1 (STP), to revise the licensing bases to allow operation with 56 full-length control rod assemblies.

The NRC staff has determined that a regulatory audit of the STPNOC LAR should be conducted in accordance with the NRR Office Instruction LIC-111, "Regulatory Audits," for the NRC staff to gain a better understanding of the licensee's supporting calculations and other bases documents for the LAR and various supporting information, processes, and procedures.

### **2. Regulatory Audit Bases**

The basis of this audit is the LAR provided by STPNOC for the allowance of operation with 56 full-length control rod assemblies for STP Unit 1 and 10 CFR Part 50, Appendix A, "General Design Criteria."

### **3. Regulatory Audit Scope**

The scope of this audit will differ slightly from traditional audits. In an effort to increase efficiency in NRC staff reviews, the Division of Safety Systems has been promoting the use of regulatory audits at a relatively early point in the review process. The purpose of these audits is to enable the NRC staff to come to a better understanding of the material presented for review by allowing the NRC staff chances to discuss the material with the appropriate authors of the various submittals.

### **4. Information Needs**

STP should make available personnel who have intimate knowledge of the LAR and the UFSAR Chapter 15 bounding analyses. This may include site staff and contractors, if appropriate, accessible upon request (either in person or by phone). The personnel should be able to respond promptly to NRC staff questions.

The licensee is requested to have appropriate documentation used in the creation of the LAR available on site for the audit team. The documentation could be provided electronically or by paper copies. If provided electronically, the licensee is requested to have at least two computers available for the audit team, with a printer attached.

- Cycle 20 Reload Documentation
  - Design Initialization (DI) Meeting Minutes
  - Reload Safety Analysis Checklist (RSAC) Transmittals

- RSAC Violations
- Reload Safety Evaluation (RSES) for each safety analysis group

Additional information needs identified during the audit will be communicated to the designated point of contact.

## 5. Team Assignments

Area of Review	Assigned Auditor
Audit Team Lead	Matthew Hardgrove (NRC)
Technical Reviewer	Joshua Borromeo (NRC)
Technical Reviewer	Joshua Kaizer (NRC)
Technical Reviewer	Ian Tseng (NRC)
Senior Technical Reviewer	George Thomas (NRC)
Senior Project Manager	Lisa Regner (NRC)

## 6. Logistics

The audit will be conducted at the Westinghouse Offices in Rockville, MD, on June 28 - 30, 2016. Entrance and exit briefings will be held at the beginning and end of this audit, respectively. The licensee is requested to provide a room, which has a white board and if necessary two computers with an attached printer, for the use by the audit team. A more detailed, proposed, audit schedule is attached.

## 7. Deliverables

An audit report/summary will be issued to the licensee within approximately 90 days from the exit date of the audit. Additionally, the results of the audit will be utilized to focus the scope of any requests for additional information issued in the course of this review.

Attachment:  
Proposed STP Audit Schedule

## **Proposed STP Audit Schedule**

**June 28 - 30, 2016**

### **June 28, 2016**

<b>8:00 a.m.</b>	<b>Check-in at Westinghouse Office</b> – meet licensee contact(s), setup for entrance meeting.
<b>8:30 a.m.</b>	<b>Entrance Meeting</b> - introductions, audit activities, goals, and logistics.
<b>9:00 a.m.</b>	<b>Licensee Walkthrough of LAR with NRC Team</b> – Overview by the licensee to describe what is in the application, and NRC explain what is understood from initial review.
<b>12:00 p.m.</b>	<b>Lunch</b>
<b>1:00 p.m.</b>	<b>NRC Team Discussion with Licensee on Initial Walk Through/Review</b> Question and answer session for NRC staff and licensee
<b>3:30 p.m.</b>	<b>Audit Team Caucus</b>
<b>4:00 p.m.</b>	<b>NRC / Licensee Interim Meeting</b>
<b>4:30 p.m.</b>	<b>Audit Team Daily Closeout</b>

### **June 29, 2016**

<b>8:00 a.m.</b>	<b>NRC Team Discussion/Document Review with the licensee</b>
<b>12:00 p.m.</b>	<b>Lunch</b>
<b>1:00 p.m.</b>	<b>NRC Team Discussion/Document Review with the licensee</b>
<b>3:30 p.m.</b>	<b>Audit Team Caucus</b>
<b>4:00 p.m.</b>	<b>NRC / Licensee Interim Meeting</b>
<b>4:30 p.m.</b>	<b>NRC / Licensee Daily Closeout</b>

**June 30, 2016**

<b>8:00 a.m.</b>	<b>NRC Team Discussion/Document Review with the licensee</b>
<b>12:00 p.m.</b>	<b>Lunch</b>
<b>1:00 p.m.</b>	<b>NRC Team Discussion/Document Review with the licensee</b>
<b>3:30 p.m.</b>	<b>Audit Team Caucus</b>
<b>4:00 p.m.</b>	<b>NRC / Licensee Interim Meeting</b>
<b>4:30 p.m.</b>	<b>NRC / Licensee Exit Meeting</b>