

James, Lois

From: James, Lois
Sent: Tuesday, June 14, 2016 2:57 PM
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Cc: RidsNrrDlr Resource; RidsNrrDlrRpb1 Resource; RidsNrrDlrRerb Resource; RidsNrrDlrRsrg Resource; RidsOgcMailCenter Resource; RidsNrrPMSouthTexas Resource; James, Lois; Diaz-Sanabria, Yoira; Holston, William; Allik, Brian; Morey, Dennis; Tran, Tam; McIntyre, David; Regner, Lisa; Taylor, Nick; Proulx, David; Janicki, Steven; Money, Shawn; Sanchez, Alfred; Hernandez, Nicholas; Maier, Bill; Pick, Greg; Graves, Samuel; Aldridge, Arden J; Gonzales, Rafael; Engen, Rob; Sterling, Lance; 'mpmurray@STPEGS.COM'
Subject: SUMMARY OF TELECON HELD ON JUNE 8, 2016, BETWEEN THE USNRC AND STP NUCLEAR OPERATING COMPANY THE RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION B2.1.18-6 PERTAINING TO THE SOUTH TEXAS PROJECT LICENSE RENEWAL APPLICATION (TAC NOS. ME4936 AND ME4937)
Attachments: Enclosure 1 to Summary of Call on June 8, 2016, with STP re Buried Piping ISG RAI response.docx; Enclosure 2 to Summary of Call on June 8, 2016, with STP re Buried Piping ISG RAI response.docx



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

June 14, 2016

LICENSEE: STP Nuclear Operating Company
FACILITY: South Texas Project
SUBJECT: SUMMARY OF TELECON HELD ON JUNE 8, 2016, BETWEEN THE USNRC AND STP NUCLEAR OPERATING COMPANY THE RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION B2.1.18-6 PERTAINING TO THE SOUTH TEXAS PROJECT LICENSE RENEWAL APPLICATION (TAC NOS. ME4936 AND ME4937)

The U.S. Nuclear Regulatory Commission and representatives of STP Nuclear Operating Company (the applicant) held a telephone conference call on June 8, 2016, to discuss and clarify the applicant's response to request for additional information B2.1.18-6 concerning the South Texas Project license renewal application.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the items discussed with the applicant, including a brief description on their status.

The applicant had an opportunity to comment on this summary.

Lois M. James, Sr. Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 & 50-499

Enclosures: 1. List of Participants

2. Summary of Telephone Conference Call

cc w/encl: Listserv

June 14, 2016

LICENSEE: STP Nuclear Operating Company

FACILITY: South Texas Project

SUBJECT: SUMMARY OF TELECON HELD ON JUNE 8, 2016, BETWEEN THE USNRC AND STP NUCLEAR OPERATING COMPANY THE RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION B2.1.18-6 PERTAINING TO THE SOUTH TEXAS PROJECT LICENSE RENEWAL APPLICATION (TAC NOS. ME4936 AND ME4937)

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ADAMS Accession No.: ML16166A027

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DATE	6/8/2016	6/9/2016	6/14/2016	6/14/2016

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**TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION**

LIST OF PARTICIPANTS
JUNE 8, 2016

PARTICIPANT

AFFILIATION

Lois M. James

U.S. Nuclear Regulatory Commission (NRC)

William Holston

NRC

Brian Allik

NRC

Arden Aldridge

South Texas Project Nuclear Operating
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Rafael Gonzales

STPNOC

Robert Engen

STPNOC

Gary Werner

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**SUMMARY OF TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION
JUNE 8, 2016**

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held a telephone conference on June 8, 2016, to discuss and clarify the applicant's response to request for additional information (RAI) B2.1.18-6 concerning the license renewal application (LRA).

Background:

By letter dated May 19, 2016, the applicant provided its response to RAI B2.1.18-6. In this letter, the applicant provided a comparison of the existing Buried Piping and Tank Inspections Program to Aging Management Program (AMP) XI.M41 and the associated UFSAR Summary Description issued in License Renewal (LR) Interim Staff Guidance (ISG) LR-ISG-2015-01.

Based on the RAI response, the staff needs clarification regarding three items:

1. In its response to RAI B2.1.18-6 dated May 19, 2016, the applicant did not provide evidence that it will utilize, as recommended in the "parameters monitored or inspected" program element a method that has been demonstrated to be capable of detecting cracking. AMP XI.M41 recommends that inspections for cracking are conducted when coating degradation has been noted. Given that the buried stainless steel piping is not coated, it is not clear to the staff why inspections for cracking would not be conducted when buried stainless steel piping is inspected as recommended by the "detection of aging effects" program element of AMP XI.M41. The applicant stated that soil samples have demonstrated that there are no environmental chlorides; however, the purpose of inspections is to verify that degradation is not occurring.
2. Neither the "acceptance criteria" program element nor "corrective actions" program element state that the measured wall thickness will be projected to the end of the period of extended operation in order for the component to meet acceptance criteria and to not conduct expanded inspections. In addition, the "corrective actions" program element does not state that: (a) unacceptable cathodic protection survey results are entered into the plant corrective action program; (b) sources of leakage detected during pressure tests are identified and corrected; and (c) indications of cracking are evaluated in accordance with applicable codes and plant-specific design criteria.
3. The staff noted the LRA Section A1.18 does not state that the number of inspections is based on the effectiveness of the preventive and mitigative actions. In addition, it does not state that where the coatings, backfill or the condition of exposed piping does not meet acceptance criteria such that the depth or extent of degradation of the base metal could have resulted in a loss of pressure boundary function when the loss of material rate is extrapolated to the end of the period of extended operation, an increase in the sample size is conducted.

ENCLOSURE 2

Discussion:

During a conference call held on June 8, 2016, the applicant and the staff discussed the three items listed above. The applicant agreed to revise:

1. Appendix B to demonstrate indicate that inspections for cracking would be conducted when buried stainless steel piping is inspected as recommended by the "detection of aging effects" program element of AMP XI.M41. The applicant agreed to state that they would either use a method demonstrated to be effective at detecting cracking or ASME Section XI surface examinations or VT-1 examinations.
2. Appendix B to state that either the "acceptance criteria" program element or the "corrective actions" program element will state that the measured wall thickness will be projected to the end of the period of extended operation in order for the component to meet acceptance criteria and to not conduct expanded inspections. In addition, the "corrective actions" program element will state that: (a) unacceptable cathodic protection survey results are entered into the plant corrective action program; (b) sources of leakage detected during pressure tests are identified and corrected; and (c) indications of cracking are evaluated in accordance with applicable codes and plant-specific design criteria.
3. LRA Section A1.18 to state that the number of inspections is based on the effectiveness of the preventive and mitigative actions. In addition, it will state that where the coatings, backfill or the condition of exposed piping does not meet acceptance criteria such that the depth or extent of degradation of the base metal could have resulted in a loss of pressure boundary function when the loss of material rate is extrapolated to the end of the period of extended operation, an increase in the sample size is conducted.