

James, Lois

From: James, Lois
Sent: Friday, October 21, 2016 8:48 AM
To: 'Aldridge, Arden J'; Gonzales, Rafael; Engen, Rob
Cc: Min, Seung K; Morey, Dennis; Diaz-Sanabria, Yaira K
Subject: ACTION: Draft Request for Additional Information - STP LRA Safety Review (ME4936 and ME4937)
Attachments: STP LR Draft RAI B2 1 8-3 re ISG-2016-01.pdf

Docket Nos. 50-498 and 50-499

Arden,

By letter dated October 25, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML103010256), South Texas Project (STP) Nuclear Operating Company (STPNOC), submitted a License Renewal Application (LRA) pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54 for review by the U.S. Nuclear Regulatory Commission (NRC or the staff), to renew operating licenses NPF-76 and NPF-80 for South Texas Project, Units 1 and 2, for an additional 20 years

The staff is in the process of finalizing License Renewal Interim Staff Guidance (ISG)-2016-01, Changes to Aging Management Guidance for Various Steam Generator Components. This ISG is expected to be issued final prior to the staff issuing the STP renewed licenses. Therefore, the staff needs to address the issues contained in ISG-2016-01 in the final Safety Evaluation Report (SER) which is due to be issued in December 2016.

Due to the close timing of the issuance of ISG-2016-01 and the issuance of the STP final SER, I requested the staff provide me draft requests for additional information (RAIs) to ensure that we have complete information to document the ISG in the final SER. I have attached the draft RAIs and would like to schedule a follow-up call to discuss.

Regarding the schedule, I will issue these RAIs final on the same day the ISG is issued final and will give you two (2) weeks to provide your response. I am hopeful that, with this schedule, the staff can issue the STP final SER by the end of December 2016.

Lois M. James, Senior Project Manager
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Draft RAI B2.1.8-3

Background:

The staff issued draft License Renewal Interim Staff Guidance (LR-ISG) 2016-01, "Changes to Aging Management Guidance for Various Steam Generator Components" on June 7, 2016 (81 *Federal Register* (FR) 36612). Industry consolidated comments on this draft LR-ISG were submitted by a letter dated July 7, 2016 (Agencywide Document Access and Management System (ADAMS) Accession Number ML16194A026). During a public meeting on September 15, 2016, the staff presented its positions related to major public comments as follows.

- Visual inspections on steam generator head internal areas (head interior surfaces, divider plate assemblies, tubesheets (primary side) and tube-to-tubesheet welds) in order to identify signs of cracking or loss of material (e.g., rust stains and distortion of divider plates).
- Frequency of the visual inspections: at least every 72 effective full power months or every third refueling outage whichever results in more frequent inspections
- Implementation of the latest EPRI steam generator guidelines such as (a) EPRI Report 1022832 (primary-to-secondary leak guidelines); (b) EPRI Report 1025132 (in-situ pressure test guidelines); (c) EPRI Report 3002007571 (integrity assessment guidelines); and (d) EPRI Report 3002007572 (examination guidelines)

Issue:

The staff found a need to confirm whether the applicant's Steam Generator Tube Integrity Program are consistent with these staff positions discussed above.

Request:

Clarify whether the Steam Generator Tube Integrity Program is consistent with the staff positions discussed above (i.e., conduct of visual inspections, visual inspection frequency, and implementation or plans for implementation of the latest EPRI steam generator guidelines by the implementation dates provided by the industry). If not, provide justification of why the applicant's Steam Generator Tube Integrity Program is adequate for aging management.