



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

December 7, 2016
NOC-AE-16003427
10 CFR 50.90

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Revised Applicability Matrix for Response to
Request for Additional Information Questions APLA-1a and APLA-1b
Regarding STP Risk-Informed GSI-191 Licensing Application (TAC Nos MF2400 and MF2401)

Reference:

Letter; J. Connolly to USNRC Document Control Desk; "Applicability of Application Supplement 1 Correspondence to Supplement 2 to STP Risk-Informed GSI-191 Licensing Application"; June 9, 2016; (NOC-AE-16003369) (ML16176A148).


In the above Reference, STP Nuclear Operating Company (STPNOC) provided information regarding request for additional information (RAI) responses that are no longer relevant to the STPNOC Risk-Informed GSI-191 application. Specifically, in Table 1 of Attachment 2 to the above Reference, STPNOC provided information related to the applicability of RAI Questions APLA-1a and APLA-1b for LOCA [Loss of Coolant Accident] Frequencies. A revised applicability basis for this item is provided in the Enclosure to this letter.

There are no commitments in this letter.

If there are any questions or if additional information is needed, please contact Drew Richards at (361) 972-7666 or me at (361) 972-7867.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/7/2016


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amr/DWR

Enclosure: Revised Applicability Matrix for RAI Questions APLA-1a and APLA-1b

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ENCLOSURE

Revised Applicability Matrix for RAI Questions APLA-1a and APLA-1b

The Applicability Matrix is revised regarding the response to APLAB, CASA Grande, LOCA Frequencies: Question 1a, 1b to separate the responses. The response to APLAB, CASA Grande, LOCA Frequencies: Question 1a is Not Applicable whereas the response 1b is Applicable as revised below.

Applicability and Letter Reference for Response	RAI	Applicability Basis	Comments
Not applicable ML14149A434 (Cover Letter Ref.4)	APLAB, CASA Grande, LOCA Frequencies: Question 1a	The most accurate modeling of failure likelihood (Loss of Coolant Accident (LOCA)) at any given location in the RCS pressure boundary would take into consideration failure mechanisms based on causal modeling of the underlying phenomena thereby producing probabilities for each location. Theoretically, such values could be used in sums to estimate the (preferentially) frequency (or likelihood) of a LOCA of any particular size in a plant. The STP 2013 LAR used a weighting scheme that attempted to preserve the NUREG 1829 frequencies but additionally taking into account in-service data where cracks were observed and some consideration of the type of service. In RoverD, a bounding method, called top-down, was adopted that avoids the need to account for weighting by relying on the fact that locations where debris amounts exceed tested levels have been mitigated. That is, the problematic or "risk" locations have been mitigated and only the non-"risk" locations have not been. The RoverD methodology ignores the mitigation improvements and equally weights the NUREG 1829 exceedance frequencies for all locations thereby bounding local effects.	
Applicable ML14149A434 (Cover Letter Ref.4)	APLAB, CASA Grande, LOCA Frequencies: Question 1b	The conclusions described in the response to APLAB, CASA Grande – LOCA Frequencies: RAI 1b regarding preserving non-piping contribution to LOCA frequency are applicable to the RoverD LOCA frequency analysis. RoverD relies on using welds located with sufficient spatial resolution that contribution from components as are included in the NUREG 1829 frequency analysis are appropriately represented and preserved. RoverD also relies on the analysis that reactor vessel components otherwise relatively distant from weld locations are located in areas unimportant to generation of transportable debris (thereby conservatively shifting their frequency contribution to locations important to generation of transportable debris).	