

From: Galvin, Dennis
Sent: Wednesday, February 19, 2020 9:12 AM
To: Drew Richards (amrichards@stpegs.com)
Cc: Dixon-Herrity, Jennifer; Nic Boehmisch (nboehmisch@stpegs.com)
Subject: South Texas Project – Acceptance of Requested Licensing Actions - Proposed Alternatives to ASME OM Code Requirements (EPID: L 2020-LLR-0007 to L-2020-LLR-0010)

Mr. Richards,

By four letters dated January 22, 2020 (Agencywide Documents Access and Management System Accession Nos. ML20022A318, ML20022A319, ML20022A320, and ML20022A321), STP Nuclear Operating Company (STPNOC, the licensee) submitted four proposed alternatives to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), for pumps at South Texas Project (STP) Units 1 and 2.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's acceptance review of these proposed relief requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether any submittal has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the Code of Federal Regulations (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your submittals and concluded that they provide technical information in sufficient detail to enable the staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed relief requests in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, there may be instances in which issues that impact the staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

Based on the information provided in your submittals, the NRC staff has estimated that these licensing requests will take approximately 60 hours each to complete or approximately 240 hours total. The NRC staff expects to complete this review by September 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the applications and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

Please contact me with any questions.

Respectfully,

Dennis Galvin
Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Licensing Project Branch 4
301-415-6256

Docket No. 50-498 and 50-499

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"Nic Boehmisch (nboehmisch@stpegs.com)" <nboehmisch@stpegs.com>
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"Drew Richards (amrichards@stpegs.com)" <amrichards@stpegs.com>
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