



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

March 11, 2025

Kimberly A. Harshaw, Acting President,  
Chief Executive Officer and Chief Nuclear Officer  
STP Nuclear Operating Company  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: ANNUAL ASSESSMENT LETTER FOR SOUTH TEXAS PROJECT ELECTRIC  
GENERATING STATION, UNITS 1 AND 2 (REPORT 05000498/2024006 AND  
05000499/2024006)

Dear Kimberly A. Harshaw:

The U.S. Nuclear Regulatory Commission (NRC) has completed its end-of-cycle performance assessment of South Texas Project Electric Generating Station, Units 1 and 2, reviewing performance indicators (PIs), inspection results, and enforcement actions from January 1, 2024, through December 31, 2024. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. The NRC concluded that overall performance at your facility preserved public health and safety. The baseline inspection program was completed at your facility as defined in Inspection Manual Chapter 2515, "Light-Water Reactor Inspection Program - Operations Phase."

The NRC determined the performance at South Texas Project Electric Generating Station, Unit 1 during the most recent quarter was within the Licensee Response Column, the highest performance category of the NRC's Reactor Oversight Process (ROP) Action Matrix, because all inspection findings had very low safety significance (i.e., Green), and all PIs were within the expected range (i.e., Green). However, the NRC determined the performance at South Texas Project Electric Generating Station, Unit 2 during the most recent quarter was within the Regulatory Response Column, the second highest performance column of the ROP Action Matrix. This conclusion was based on a single inspection finding having low-to-moderate safety significance (i.e., White) in the Initiating Events Cornerstone originating in the fourth quarter of 2024, and all PIs within the expected range (i.e., Green). This was a change in Action Matrix status for Unit 2 from the Licensee Response Column since the end of the previous assessment period. The NRC informed you of this change when the White finding was issued (Final Significance Determination of a White Finding, Notice of Violation, and Follow-Up Assessment Letter dated January 21, 2025, Agencywide Documents Access and Management System [ADAMS] Accession No. ML25007A210).

Therefore, in addition to ROP baseline inspections, the NRC plans to conduct a supplemental inspection in accordance with Inspection Procedure (IP) 95001, "Supplemental Response to Action Matrix Column 2 (Regulatory Response) Inputs."

This inspection procedure is conducted to provide assurance that the root cause and contributing causes of risk significant performance issues are understood, the extent of condition and the extent of cause are identified, and the corrective actions are sufficient to prevent recurrence. This inspection will be scheduled when you notify the NRC of your readiness.

The NRC identified a cross-cutting theme in the Avoid Complacency aspect of the Human Performance Area. Specifically, six findings were identified in a 12-month period that had the cross-cutting aspect Avoid Complacency (H.12) and were representative of three cornerstones (Mitigating Systems, Emergency Preparedness, and Public Radiation Safety). The NRC will review your efforts to address the trend consistent with the cross-cutting theme follow-up actions in Inspection Manual Chapter (IMC) 0305, and should a theme continue to be present at the next assessment cycle the agency will continue to take actions prescribed in IMC 0305 to monitor your efforts to address the theme.

The enclosed inspection plan lists the inspections scheduled through December 31, 2026. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last twelve months of the inspection plan are tentative and may be revised. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. During 2025, the Regional Administrator has authorized completing IP 71003, "Post-Approval Site Inspection for License Renewal," for Unit 2.

From November 2023 through November 2024, the NRC issued four Severity Level IV traditional enforcement violations associated with impeding the regulatory process. The NRC referred to three of these violations in our November 21, 2024, Special Inspection Team Inspection Report 05000498/2024050 and 05000499/2024050, (ADAMS Accession No. ML24320A137). An additional violation in this category was documented in NRC Examination Report 05000498/2024301 and 05000499/2024301 (ADAMS Accession No. ML24276A201). In accordance with IMC 0305, the NRC has evaluated the use of IP 92723, "Follow-Up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period." Consistent with the message the NRC communicated in the Special Inspection Team Inspection Report, the NRC determined IP 92723 would not be performed at this time because the four violations did not appear to have a common causal thread, some of the violations were partially licensee-identified, and impacts to the regulatory process were not significant. However, the NRC concluded that use of this inspection procedure will be reevaluated if additional traditional enforcement violations are accrued.

This letter and its enclosure will be made available for public inspection and copying at [ADAMS Public Documents | NRC.gov](https://www.nrc.gov/public-documents) and at the NRC Public Document Room in accordance with Title 10 of the Code of Federal Regulations 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Please contact Patricia Vossmar at (817) 200-1144 with any questions you have regarding this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Geoffrey B. Miller".

Signed by Miller, Geoffrey  
on 03/11/25

Geoffrey B. Miller, Director  
Division of Operating Reactor Safety

Docket Nos. 05000498 and 05000499  
License Nos. NPF-76 and NPF-80

Enclosure:  
Inspection Plan

cc w/ encl: Distribution via LISTSERV

ANNUAL ASSESSMENT LETTER FOR SOUTH TEXAS ELECTRIC GENERATING STATION,  
UNITS 1 AND 2 (REPORT 05000498/2024006 AND 05000499/2024006) – DATED  
MARCH 11, 2025

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DOCUMENT NAME: ANNUAL ASSESSMENT LETTER FOR SOUTH TEXAS ELECTRIC GENERATING STATION,  
UNITS 1 AND 2 (REPORT 05000498/2024006 AND 05000499/2024006)

ADAMS ACCESSION NUMBER: **ML25062A164**

☒ SUNSI Review

ADAMS:

☐ Non-Publicly Available

☒ Non-Sensitive Keyword:

By: RLB

☒ Yes ☐ No

☒ Publicly Available

☐ Sensitive

NRC-002

OFFICE	SPE:DORS:PBA	BC:DORS:PBA	D:DORS
NAME	RBywater	PVossmar	GMiller
SIGNATURE	/RA/	/RA/	/RA/
DATE	03/03/25	03/03/25	03/11/25

**OFFICIAL RECORD COPY**

# Site Inspection Activity Plan

## 07201041 - South Texas Project (ISFSI)

01/01/2025 - 12/31/2026

Unit	Start	End	Activity	CAC	Title	Staff Count
STP ISFSI Part 72 NCV for CBS						2
	2/13/2025	2/13/2025	IP 60855	001001	Operation Of An ISFSI	
STP Triennial ISFSI Inspection (one-week during loading campaign) (Part 72)						2
	5/11/2025	5/17/2025	IP 60855	001001	Operation Of An ISFSI	

# Site Inspection Activity Plan

## South Texas Project

01/01/2025 - 12/31/2026

Unit	Start	End	Activity	CAC	Title	Staff Count
<b>STP ISFSI Part 50 feeder to Q1</b>						2
1,2	2/13/2025	2/13/2025	IP 60855	001001	Operation Of An ISFSI	
<b>EP 2025 Program Inspection - STP</b>						1
1,2	4/14/2025	4/18/2025	IP 71114.02	000717	Alert and Notification System Testing	
1,2	4/14/2025	4/18/2025	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1,2	4/14/2025	4/18/2025	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1,2	4/14/2025	4/18/2025	IP 71114.05	000720	Maintenance of Emergency Preparedness	
1,2	4/14/2025	4/18/2025	IP 71151	001397	Performance Indicator Verification	
<b>Security Protective Strategy (71130.05) and Target Sets (71130.14)</b>						2
1,2	5/12/2025	5/17/2025	IP 71130.05	000737	Protective Strategy Evaluation	
1,2	5/12/2025	5/16/2025	IP 71130.14	000743	Review of Power Reactor Target Sets	
<b>Comprehensive Engineering Team Inspection - South Texas</b>						7
1,2	7/14/2025	7/18/2025	IP 71111.21M	000713	Comprehensive Engineering Team Inspection	
1,2	7/28/2025	8/1/2025	IP 71111.21M	000713	Comprehensive Engineering Team Inspection	
<b>STP 2025 BRQ</b>						2
1,2	8/3/2025	8/9/2025	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	
<b>Security Access Control (71130.02), Security Plan Changes (71130.09), Security PIV (71151)</b>						1
1,2	9/8/2025	9/12/2025	IP 71130.02	000734	Access Control	
1,2	9/8/2025	9/12/2025	IP 71130.09	001656	Security Plan Changes	
1,2	9/8/2025	9/12/2025	IP 71151	001338	Performance Indicator Verification	
<b>STP 2025 INITIAL EXAM</b>						6
1,2	8/24/2025	8/30/2025	OV	000956	FB-OR-Onsite Validation Of Initial License Examination (OV)	
1,2	9/28/2025	10/11/2025	EXAD	000500	FB-OR-Initial License Exam Administration (EXAD)	
<b>Inservice Inspection- STP (U2)</b>						1
2	10/13/2025	10/24/2025	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
<b>RP 1,4,PI - STP</b>						2
1,2	10/13/2025	10/17/2025	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1,2	10/13/2025	10/17/2025	IP 71124.04	000728	Occupational Dose Assessment	
1,2	10/13/2025	10/17/2025	IP 71151	000746	Performance Indicator Verification	
<b>License Renewal Inspection 71003 - STP Unit 2 (Phase 1)</b>						2
2	10/19/2025	10/25/2025	IP 71003	000687	Post-Approval Site Inspection for License Renewal	
<b>Security FFD</b>						1

# Site Inspection Activity Plan

1,2	2/2/2026	2/6/2026	IP 71130.08	000740	Fitness-For-Duty Program	
<b>Inservice Inspection - STP (U1)</b>						1
1	3/30/2026	4/10/2026	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
<b>RP 1,3,PI - STP</b>						2
1,2	3/30/2026	4/3/2026	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1,2	3/30/2026	4/3/2026	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
1,2	3/30/2026	4/3/2026	IP 71151	000746	Performance Indicator Verification	
<b>Security AA-AC-PIV-Plan Change</b>						2
1,2	5/11/2026	5/15/2026	IP 71130.01	000733	Access Authorization	
1,2	5/11/2026	5/15/2026	IP 71130.02	000734	Access Control	
1,2	5/11/2026	5/15/2026	IP 71130.09	001656	Security Plan Changes	
1,2	5/11/2026	5/15/2026	IP 71151	001338	Performance Indicator Verification	
<b>Cybersecurity - STP</b>						4
1,2	6/8/2026	6/12/2026	IP 71130.10	000741	Cybersecurity	
<b>MC&amp;A - STP</b>						1
1,2	6/29/2026	7/3/2026	IP 71130.11	000742	Material Control and Accounting (MC&A)	
<b>South Texas Project 2026 PI&amp;R</b>						4
1,2	8/17/2026	9/4/2026	IP 71152B	000747	Problem Identification and Resolution	
<b>STP 2026 INITIAL EXAM</b>						6
1,2	8/2/2026	8/8/2026	OV	000956	FB-OR-Onsite Validation Of Initial License Examination (OV)	
1,2	9/13/2026	9/19/2026	EXAD	000500	FB-OR-Initial License Exam Administration (EXAD)	
<b>Age-Related Degradation Inspection – South Texas Project</b>						3
1,2	9/14/2026	9/18/2026	IP 71111.21N.04	001832	Age-Related Degradation	
1,2	9/28/2026	10/2/2026	IP 71111.21N.04	001832	Age-Related Degradation	
<b>EP Exercise &amp; PI Inspection (2026) - STP</b>						5
1,2	10/19/2026	10/23/2026	IP 71114.01	000716	Exercise Evaluation	
1,2	10/19/2026	10/23/2026	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1,2	10/19/2026	10/23/2026	IP 71151	001397	Performance Indicator Verification	
<b>RP 5,8</b>						2
1,2	11/2/2026	11/6/2026	IP 71124.05	000729	Radiation Monitoring Instrumentation	
1,2	11/2/2026	11/6/2026	IP 71124.08	000732	Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation	