



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

August 17, 2009

Mr. Edward D. Halpin  
Chief Nuclear Officer  
STP Nuclear Operating Company  
South Texas Project  
P.O. Box 289  
Wadsworth, TX 77483

**SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 – CORRECTION TO CORRECTION LETTER DATED DECEMBER 2, 2008, REGARDING AMENDMENTS 188 AND 175 TO RELOCATE SURVEILLANCE TEST INTERVALS TO LICENSEE-CONTROLLED SURVEILLANCE FREQUENCY CONTROL PROGRAM (RISK-INFORMED INITIATIVE 5-b), ISSUED ON OCTOBER 31, 2008 (TAC NOS. MD7058 AND MD7059)**

Dear Mr. Halpin:

On October 31, 2008, the Nuclear Regulatory Commission (NRC) issued Amendment No. 188 to Facility Operating License No. NPF-76 and Amendment No. 175 to Facility Operating License No. NPF-80 for South Texas Project (STP), Units 1 and 2, respectively, in response to your application dated October 23, 2007. That document was e-mailed to you on October 31, 2008, and declared in the NRC Agencywide Documents Access and Management System (ADAMS) at ADAMS Accession No. ML082830172.

The amendments revised the Technical Specifications (TS) by relocating the surveillance frequencies of most of the surveillance tests from the TS to a licensee-controlled surveillance frequency control program.

The distribution of the amendments was performed by the then newly developed electronic distribution (Listserv) process. The distribution was accomplished by scanning the document in ADAMS, and e-mailing it to recipients on the STP Listserv e-mail distribution list (plant mailing list). A scanning error was rectified in the correction letter dated November 17, 2008 (ADAMS Accession No. ML083170477); however, that correction letter inadvertently omitted TS page 3/4 2-2 from the TS pages issued as an enclosure to the November 17, 2008, correction letter. That error was corrected by letter dated December 2, 2008, by restoring the TS page 3/4 2-2 which was inadvertently omitted from the November 17, 2008, letter.


On February 4, 2009, STP Nuclear Operating Company (STPNOC) informed the NRC staff that TS pages 3/4 3-44, 3/4 3-49, 3/4 5-1, 3/4 5-4, and 3/4 8-13a, sent to the NRC staff, were not updated to reflect the changes on those pages approved in the intervening amendments, because those amendments had not been implemented at the time when STPNOC forwarded them to NRC. This administrative error affected only TS pages 3/4 3-44, 3/4 3-49, 3/4 5-1, 3/4 5-4, and 3/4 8-13a of Amendment Nos. 188 and 175, dated October 31, 2008, and does not change the staff's conclusions regarding Amendment Nos. 188 and 175. Enclosed are

E. Halpin

- 2 -

corrected pages 3/4 3-44, 3/4 3-49, 3/4 5-1, 3/4 5-4, and 3/4 8-13a for Amendment Nos. 188 and 175; please replace them in the amendment issued on October 31, 2008.

Sincerely,

  
Mohan C. Thadani, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
As stated

cc: Distribution via Listserv

ENCLOSURE

South Texas Project, Units 1 and 2

License Amendment Nos. 188 and 175, Issued October 31, 2008

Corrected Technical Specification Pages

3/4 3-44

3/4 3-49

3/4 5-1

3/4 5-4

3/4 8-13a

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>CHANNEL FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK(9)</u>	<u>CHANNEL CALIBRATION(9)</u>	<u>DIGITAL OR ANALOG CHANNEL OPERATIONAL TEST(7)(9)</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST(9)</u>	<u>ACTUATION LOGIC TEST(9)</u>	<u>MASTER RELAY TEST(9)</u>	<u>SLAVE RELAY TEST(9)</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
3. Containment Isolation (Continued)								
3) Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							
4) RCB Purge Radioactivity-High				N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
5) Containment Spray - Manual Initiation	See Item 2. above for Containment Spray manual initiation Surveillance Requirements.							
6) Phase "A" Isolation- Manual Initiation	See Item 3. a. above for Phase "A" Isolation manual initiation Surveillance Requirements.							
c. Phase "B" Isolation								
1) Automatic Actuation Logic	N.A.	N.A.	N.A.	N.A.	(1)	N.A.	N.A.	1, 2, 3, 4
2) Actuation Relays	N.A.	N.A.	N.A.	N.A.	N.A.	(6)	(8)	1, 2, 3, 4
3) Containment Pressure--High-3				N.A.	N.A.	N.A.	N.A.	1, 2, 3
4) Containment Spray- Manual Initiation	See Item 2. above for Containment Spray manual initiation Surveillance Requirements.							
d. RCP Seal Injection Isolation								
1) Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	N.A.		(8)	1, 2, 3, 4
2) Charging Header Pressure - Low Coincident with Phase "A" Isolation				N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
	See Item 3.a. above for Phase "A" surveillance requirements.							

SOUTH TEXAS - UNITS 1 & 2

3/4 3-44

Unit 1 - Amendment No. 4, 59, 136, 152, 182, 188  
Unit 2 - Amendment No. 47, 125, 140, 169, 175

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

TABLE NOTATION

- (1) Each train shall be tested at the frequency specified in the Surveillance Frequency Control Program.
- (2) Deleted
- (3) Deleted
- (4) Deleted
- (5) Deleted
- (6) Each actuation train shall be tested at a frequency in accordance with the Surveillance Frequency Control Program. Testing of each actuation train shall include master relay testing of both logic trains. If an ESFAS instrumentation channel is inoperable due to failure of the Actuation Logic Test and/or Master Relay Test, increase the surveillance frequency such that each train is tested at the frequency specified in the Surveillance Frequency Control Program unless the failure can be determined by performance of an engineering evaluation to be a single random failure.
- (7) For channels with bypass test instrumentation, input relays are tested at a frequency in accordance with the Surveillance Frequency Control Program.
- (8) The test interval is R for Potter & Brumfield MDR Series slave relays.
- (9) Frequencies are specified in the Surveillance Frequency Control Program unless otherwise noted in the table.

### 3/4.5 EMERGENCY CORE COOLING SYSTEMS

#### 3/4.5.1 ACCUMULATORS

##### LIMITING CONDITION FOR OPERATION

---

3.5.1 Each Safety Injection System accumulator shall be OPERABLE

APPLICABILITY: MODES 1 and 2  
MODE 3 with pressurizer pressure > 1000 psig

ACTION:

- a. With one accumulator inoperable, except as a result of boron concentration outside the required limits, within 24 hours restore the inoperable accumulator to OPERABLE status or apply the requirements of the CRMP, or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- b. With more than one accumulator inoperable, except as a result boron concentration outside the required limits, within 1 hour restore at least two accumulators to OPERABLE status or apply the requirements of the CRMP, or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- c. With the boron concentration of one accumulator outside the required limit, within 72 hours restore the boron concentration to within the required limits or apply the requirements of the CRMP, or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- d. With the boron concentrations of more than one accumulator outside the required limit, within 1 hour restore the boron concentration of at least two accumulators to within the required limits or apply the requirements of the CRMP, or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.

##### SURVEILLANCE REQUIREMENTS

---

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

- a. At a frequency in accordance with the Surveillance Frequency Control Program by:
  - 1) Verifying the contained borated water volume is  $\geq 8800$  gallons and  $\leq 9100$  gallons and nitrogen cover-pressure is  $\geq 590$  psig and  $\leq 670$  psig, and
  - 2) Verifying that each accumulator isolation valve is open.
- b. At a frequency in accordance with the Surveillance Frequency Control Program and within 6 hours\* after each solution volume increase of greater than or equal to 1% of tank volume that is not the result of addition from the RWST by verifying the boron concentration of the accumulator solution is  $\geq 2700$  ppm and  $\leq 3000$  ppm, and
- c. At a frequency in accordance with the Surveillance Frequency Control Program when the RCS pressure is above 1000 psig by verifying that power to the isolation valve operator is removed.

\* The 6 hr. SR is only required to be performed for affected accumulators.

## EMERGENCY CORE COOLING SYSTEMS

### SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At a frequency in accordance with the Surveillance Frequency Control Program by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>		<u>Valve Function</u>	<u>Valve Position</u>
XSI0008	A, B, C	High Head Hot Leg Recirculation Isolation	Closed
XRH0019	A, B, C	Low Head Hot Leg Recirculation Isolation	Closed

- b. At a frequency in accordance with the Surveillance Frequency Control Program by:
- 1) Verifying that the ECCS piping is full of water by venting the ECCS pump casings and accessible discharge piping high points, and
  - 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:
- 1) For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
  - 2) Of the areas affected within containment at the completion of each containment entry when CONTAINMENT INTEGRITY is established.
- d. At a frequency in accordance with the Surveillance Frequency Control Program by a visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components show no evidence of structural distress or abnormal corrosion.

## ELECTRICAL POWER SYSTEMS

### LIMITING CONDITION FOR OPERATION (continued)

- Suspend all operations involving CORE ALTERATIONS, operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN or required boron concentration, AND
- Initiate corrective action to restore the required DC electrical power subsystems to OPERABLE status as soon as possible.

### SURVEILLANCE REQUIREMENTS

4.8.2.2 Each 125-volt battery bank shall be demonstrated OPERABLE:

- a. At a frequency in accordance with the Surveillance Frequency Control Program by verifying that the total battery terminal voltage is greater than or equal to the minimum established float voltage.
- b. At a frequency in accordance with the Surveillance Frequency Control Program by verifying that the battery charger can supply at least 300 amperes at greater than or equal to the minimum established float voltage for at least 8 hours.

OR:

Verify each battery charger can recharge the battery to the fully charged state within 12 hours while supplying the largest combined demands of the various continuous steady-state loads following a battery discharge to the bounding design-basis event discharge state.

c.

- |  |
|--|
| <p>NOTE: 1. The modified performance discharge test in SR 4.8.2.3.f may be performed in lieu of Surveillance Requirement 4.8.2.2.c.</p> <p>2. Credit may be taken for unplanned events that satisfy this surveillance requirement.</p> |
|--|

At a frequency in accordance with the Surveillance Frequency Control Program by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status all of the actual or simulated ESF loads for the design duty cycle when the battery is subjected to a battery service test.



E. Halpin

- 2 -

corrected pages 3/4 3-44, 3/4 3-49, 3/4 5-1, 3/4 5-4, and 3/4 8-13a for Amendment Nos. 188 and 175; please replace them in the amendment issued on October 31, 2008.

Sincerely,

*/RA by Balwant K. Singal for/*

Mohan C. Thadani, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:  
As stated

cc: Distribution via Listserv

**DISTRIBUTION:**

PUBLIC	RidsNrrDorIDpr Resource	RidsNrrLAJBurkhardt Resource
LPLIV Reading	RidsNrrDorILpl4 Resource	RidsOgcRp Resource
RidsAcrsAcnw_MailCTR Resource	RidsNrrDraApla Resource	RidsRgn4MailCenter Resource
RidsNrrDirsltsb Resource	RidsNrrPMMThadani Resource	AHowe, NRR/DRA/APLA

**ADAMS Accession No. ML092260475**

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/LPL4/BC	NRR/LPL4/PM
NAME	MThadani	JBurkhardt	MMarkley MThadani for	MThadani BSingal for
DATE	8/17/09	8/17/09	8/17/09	8/17/09

**OFFICIAL RECORD COPY**