## **NRR-PMDAPEm Resource**

Singal, Balwant
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Lsterling@stpegs.com
Request for Additional Information - License Amendment Request for Revision to Technical
Specification Table 3.3-1 (TACs MF3319 and MF3320)
MF3319-RAI-STSB.docx

By letter dated January 6, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14035A075), as supplemented by letter dated June 9, 2014 (ADAMS Accession No. ML14184B363), STP Nuclear Operating Company (the licensee) submitted a license amendment request (LAR) to revise South Texas Project (STP), Unit 1 and 2, Technical Specification (TS) 3.3.1, "Reactor Trip System Instrumentation," Table 3.3-1. The proposed amendment would revise TS 3.3.1 allowed outage times and required actions for inoperable reactor trip breakers, Functional Unit 20, to be consistent with those generically approved in NUREG- 1431, Standard Technical Specifications, Westinghouse Plants, Revision 4.

U.S. Nuclear Regulatory Commission (NRC) staff has identified the need for the additional information (RAI) described in the attachment to this e-mail to complete its review of the LAR.

The Draft RAIs were transmitted on October 30, 2014 and the NRC staff was informed on November 4, 2014 that a clarification call is not needed. Please provide your response within 30 days from the date of this e-mail and treat this e-mail as formal transmittal of RAIs.

Balwant K. Singal Senior Project Manager (Comanche Peak, STP, and Palo Verde) Nuclear Regulatory Commission Division of Operating Reactor Licensing <u>Balwant.Singal@nrc.gov</u> Tel: (301) 415-3016 Fax: (301) 415-1222

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# REQUEST FOR ADDITIONAL INFORMATION SOUTH TEXAS PROJECT, UNITS 1 AND 2 LICENSE AMENDMENT OF TS 3.3.1, "REACTOR TRIP SYSTEM INSTRUMENTATION", FUNCTIONAL UNIT 20 DOCKET NOS. 50-498 AND 50-499

By letter dated January 6, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14035A075), as supplemented by letter dated June 9, 2014 (ADAMS Accession No. ML14184B363), STP Nuclear Operating Company (the licensee) submitted a license amendment request (LAR) to revise South Texas Project (STP), Unit 1 and 2, Technical Specification (TS) 3.3.1, "Reactor Trip System Instrumentation," Table 3.3-1. The proposed amendment would revise TS 3.3.1 allowed outage times and required actions for inoperable reactor trip breakers, Functional Unit 20, to be consistent with those generically approved in NUREG- 1431, Standard Technical Specifications, Westinghouse Plants, Revision 4.

U.S. Nuclear Regulatory Commission (NRC) staff has identified the need for the following additional information to complete its review of the LAR.

### Basis for the Request

The licensee is proposing to add New Action 12A to Function 20, Reactor Trip Breakers, in TS 3.3.1, "Reactor Trip System Instrumentation," Table 3.3-1. The licensee stated in its application that this change is consistent with NUREG-1431, Revision 4.0, "Standard Technical Specifications, Westinghouse Plants."

## New Action 12A states:

"With one of the diverse trip features (undervoltage or shunt trip attachment) inoperable, within 48 hours restore it to OPERABLE status or initiate action to fully insert all rods; and within the next hour place the rod control system in a condition incapable of rod withdrawal."

The licensee stated that New Action 12A would address the condition where one diverse trip feature for a reactor trip breaker is inoperable when the reactor trip breakers are in the closed position and the control rod drive system is capable of rod withdrawal in Modes 3, 4, and 5. The licensee also stated that the proposed changes to TS 3.3.1, Table 3.3-1, New Action 12A address a condition that is not in South Texas Project (STP) TSs.

#### **Request for Additional Information**

Since New Action 12A is not in the licensee's current licensing basis (CLB), please explain why New Action 12A is needed and provide a technical evaluation for this

change. In addition, please explain, given the CLB TS, how would the inoperability of a diverse trip feature impact the operability of a reactor trip breaker during the modes of applicability. Please include discussion of any TS actions entered, since this New Action 12A is currently not in STP's TSs.