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

June 25, 2019
NOC-AE-19003673
10 CFR 50.90

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

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Request for Additional Information for
South Texas Project (STP) Units 1 & 2 License Amendment Request to
Revise Technical Specification 3.8.1.1 (A.C. Sources, Operating) (L-2018-LLA-0078)

References:

1. Letter; J. Connolly to USNRC Document Control Desk; "License Amendment Request to Revise Technical Specification 3.8.1.1 (A.C. Sources, Operating)"; March 27, 2018; (NOC-AE-17003529) (ML18086B761).
2. E-mail; L. Regner (NRC) to D. Richards (STP); "Final RAI – South Texas Standby DG TS change (L-2018-LLA-0078)"; October 10, 2018; (AE-NOC-18003142) (ML18283B952).
3. Letter; J. Connolly to USNRC Document Control Desk; "Response to Request for Additional Information for South Texas Project (STP) Units 1 & 2 License Amendment Request to Revise Technical Specification 3.8.1.1 (A.C. Sources, Operating) (L-2018-LLA-0078)"; December 6, 2018; (NOC-AE-18003602) (ML18340A206).
4. E-mail; L. Regner to D. Richards; "DRAFT Round 2 RAI - SBDG Voltage and Frequency LAR (L-2018-LLA-0078)"; March 21, 2019; (AE-NOC-19003170) (ML19081A151).
5. Letter; M. Schaefer to USNRC Document Control Desk; "Supplement to South Texas Project (STP) Units 1 & 2 License Amendment Request to Revise Technical Specification 3.8.1.1 (A.C. Sources, Operating) (L-2018-LLA-0078)"; May 16, 2019; (NOC-AE-19003637) (ML19136A408).
6. E-mail; E. Miller (NRC) to D. Richards (STP); "Draft RAI for STP TS 3.8.1.1 SBDG SR Change"; June 14, 2019; (ML19165A103).

By Reference 1, STP Nuclear Operating Company (STPNOC) requested approval of a license amendment to Technical Specification 3.8.1.1 to revise certain minimum voltage and frequency acceptance criteria for steady-state standby diesel generator surveillance testing. By References 2 and 4, the NRC staff sent requests for additional information (RAIs) to complete its review. STPNOC responsed to these RAIs by References 3 and 5, respectively. By Reference 6, the NRC staff sent an additional RAI. The STPNOC response to this RAI is provided in the Enclosure to this letter.

STI: 34868421

There are no commitments in this letter.

If there are any questions or if additional information is needed, please contact Wendy Brost at (361) 972-8516 or me at (361) 972-7344.

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

Executed on June 25, 2019

James W. Connolly
Executive Vice President &
Chief Nuclear Officer

web/JWC

Enclosure: Response to Request for Additional Information

cc:

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
1600 E. Lamar Boulevard
Arlington, TX 76011-4511

Ed Miller
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (O9E01)
11555 Rockville Pike
Rockville, MD 20852

# ENCLOSURE

## Response to Request for Additional Information

STP NUCLEAR OPERATING COMPANY

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION UNITS 1 AND 2
DOCKET NUMBERS 50-498 AND 50-499
REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT REQUEST TO REVISE
TECHNICAL SPECIFICATION 3.8.1.1 (A.C. SOURCES, OPERATING)

In the submittal dated March 27, 2018, information is provided regarding the frequency results of selected EDG surveillance runs. In the supplement dated December 6, 2018 voltage results are provided for a different selection of EDG surveillance runs. Please confirm that for all fast-start surveillance runs in the last 3 years in which measurements were taken by digital recorders, the results demonstrated that the EDGs frequency and voltage were within the limits proposed in TS SR 4.8.1.1.2.5. For any instances where the parameters were not within TS limits, please provide a discussion with a focus on how the STI remains appropriate given the failure to meet the proposed parameters.

**STPNOC response**

STPNOC has confirmed that the voltage and frequency measurements for all fast-start standby diesel generator (SBDG) surveillance runs in the past three years were within the limits proposed in Technical Specification Surveillance Requirement 4.8.1.1.2.5.