

From: Galvin, Dennis
Sent: Monday, December 9, 2019 5:20 PM
To: Nic Boehmisch (nboehmisch@stpegs.com)
Cc: Drew Richards (amrichards@stpegs.com); Dixon-Herrity, Jennifer
Subject: South Texas Project – Acceptance of Requested Licensing Action - Proposed Alternative to ASME Code Requirements for the Repair of Essential Cooling Water System Class 3 Buried Piping (EPID: L 2019-LLR-0096)

Mr. Boehmisch

By letter dated September 26, 2019 (Agencywide Documents Access and Management System Accession No. ML19274C393), as supplemented by letter dated November 26, 2019 (ADAMS Accession No. ML19331A202), STP Nuclear Operating Company (STPNOC, the licensee) submitted a proposed alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) at South Texas Project (STP) Units 1 and 2. The proposed alternative to ASME Code, Section XI, IWA-4000, applies a carbon fiber reinforced polymer (CFRP) system for the internal repair of buried Essential Cooling Water (ECW) piping.

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 this proposed relief request. 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 the application 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 application and concluded that it provides 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 request 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 submittal, the NRC staff has estimated that this licensing request will take approximately 950 hours to complete. The NRC staff expects to complete this review by August 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 application 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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From: Galvin, Dennis

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