



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

August 27, 2013  
NOC-AE-13003020  
10 CFR 2.202

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

South Texas Project  
Unit 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Six-Month Status Update of Overall Integrated Plan in Response to Order EA-12-051,  
"Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0827 and MF0828)

References:

1. NRC Letter, Eric Leeds to All Power Reactor Licensees, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (EA-12-051) (AE-NOC-12002271) (ML12054A679)
2. Letter, D. L. Koehl to NRC Document Control Desk, "Overall Integrated Plan Regarding Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013 (NOC-AE-13002959) (ML13070A006)
3. NRC letter, "South Texas Project, Units 1 and 2 – Request for Additional Information RE: Overall Integrated Plan in Response to Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0827 and MF0828) dated June 7, 2013 (AE-NOC-13002439) (ML13149A092)
4. Letter, G. T. Powell to NRC Document Control Desk, "Response to Request for Additional Information Regarding the Overall Integrated Plan in Response to Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0827 and MF0828) dated June 25, 2013 (NOC-AE-13003008) (ML13190A466)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) modifying licenses with regard to requirements for reliable spent fuel pool instrumentation. On February 28, 2013, STP Nuclear Operating Company (STPNOC) submitted an Overall Integrated Plan (Reference 2) in response to the NRC Order. By letter dated June 25, 2013 (Reference 4), STPNOC provided additional information requested by the NRC (Reference 3) in regard to our Overall Integrated Plan. The purpose of this letter is to provide our six-month status of our Overall Integrated Plan pursuant to Section IV, Condition C.2, of Reference 1.

The STPNOC status report is provided in the attachment. The report provides an update of milestone accomplishments required to implement the Order since submittal of the Overall

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Integrated Plan, including any changes to the compliance method and schedule. This report also provides an update to information provided under Reference 4.

There are no regulatory commitments in this letter.

If there are any questions, please contact Robyn Savage at 361-972-7438.

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

Executed on: August 27, 2013



G. T. Powell  
Site Vice President

Attachment: Six Month Status Report for the Implementation of Order Number EA-12-051 -  
Reliable Spent Fuel Pool Instrumentation

rds

cc:

(paper copy)

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**Six Month Status Report for the Implementation of Order Number EA-12-051 -  
Reliable Spent Fuel Pool Instrumentation**

**References:**

1. Letter, D. L. Koehl to NRC Document Control Desk, "Overall Integrated Plan Regarding Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," February 28, 2013 (NOC-AE-13002959) (ML13070A006)
2. NRC Letter, Eric Leeds to All Power Reactor Licensees, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (EA-12-051) (AE-NOC-12002271) (ML12054A679)
3. NRC Japan Lessons-Learned Project Directorate Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, Revision 0, August 29, 2012 (ML12221A339)
4. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012 (ML122400399)
5. Letter, G. T. Powell to NRC Document Control Desk, "Response to Request for Additional Information Regarding the Overall Integrated Plan in Response to Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0827 and MF0828), June 25, 2013 (ML13190A466)

Reference 1 provided the Overall Integrated Plan which the STP Nuclear Operating Company ("STPNOC") will implement for Units 1 and 2 to comply with the requirements of NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (Reference 2), NRC Interim Staff Guidance JLD-ISG-2012-003, Revision 0, (Reference 3) and NEI Report 12-02, Revision 1 (Reference 4). This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan. This report also provides an update to information provided in STPNOC's response (Reference 5) to the NRC Request for Information under Reference 4.

The following status is based on information developed to date. Any changes to the following information that occur after completing and approving the final design for reliable spent fuel pool instrumentation will be provided in the periodic 6-month status reports required by Order EA-12-051.

**SIX MONTH STATUS REPORT**

**ORDER EA-12-051, RELIABLE SPENT FUEL POOL INSTRUMENTATION**

**STP NUCLEAR OPERATING COMPANY**

**SOUTH TEXAS PROJECT, UNITS 1 AND 2**

**DOCKET NOS. 50-498 AND 50-499**

**1. Introduction**

This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule. As discussed in Reference 1, any changes to the requirements in NRC JLD-ISG-2012-003 or NEI 12-02 may require relief from the requirements and schedule documented in the Overall Integrated Plan.

**2. Milestone Accomplishments**

STPNOC has selected and entered into a purchase agreement to procure Spent Fuel Pool (SFP) level instruments that, when installed, will meet the criteria designated in the integrated response plan submitted on February 28, 2013.

**3. Milestone Schedule Status**

There are no changes to the status of the milestones in the integrated plan that was submitted on February 28, 2013.

Unit 1 Milestones are as follows:

- Design/Engineering – September of 2014
- Purchase of instruments & equipment – February of 2015
- Receipt of equipment – June of 2015
- Unit 1 Installation & Functional Testing – October of 2015

Unit 2 Milestones are as follows:

- Design/Engineering – December of 2013
- Purchase of instruments & equipment – August of 2014
- Receipt of equipment – November of 2014
- Installation & Functional Testing – April of 2015

**4. Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan, however there is a correction to the information provided in the June 25, 2013 response to the NRC Request for Information (RAI). Specifically, in response to RAI 4a we stated "The VEGAPuls 62ER Through Air Radar sensor is similar in form, fit and function to the VEGAPuls 66 that was shock and vibration tested in accordance with MIL-S-901D." Further review determined that the VEGAPuls 66 was shock tested to MIL-S-901D, however, it was vibration tested to MIL-STD-167-1.

**5. Open Requests for Additional Information (RAIs)**

<b>Open RAIs</b>	<b>Status</b>
<p><b>NRC RAI-3c</b></p> <p>Please provide the following:</p> <p>c) A description of the manner by which the mechanical connections will attach the level instrument to permanent SFP structures so as to support the level sensor assembly.</p>	<p>In progress as design work continues.</p> <p>A site specific arrangement will be provided in next 6 month update.</p>
<p><b>NRC RAI-8b</b></p> <p>Please provide the following:</p> <p>b) A description of how such testing and calibration will enable the conduct of regular channel checks of each independent channel against the other, and against any other permanently-installed SFP level instrumentation.</p>	<p>In progress as design work continues.</p> <p>Progress will be reported in next 6 month update.</p>
<p><b>NRC RAI-8c</b></p> <p>Please provide the following:</p> <p>c) A description of how functional checks will be performed, and the frequency at which they will be conducted. Describe how calibration tests will be performed, and the frequency at which they will be conducted. Please provide a discussion as to how these surveillances will be incorporated into the plant surveillance program.</p>	<p>In progress as design work continues.</p> <p>It has not been determined how the checks and testing will be incorporated into current processes or how frequent the checks and testing will be performed.</p> <p>Progress will be reported in next 6 month update.</p>
<p><b>NRC RAI-8d</b></p> <p>Please provide the following:</p> <p>d) A description of what preventative maintenance tasks are required to be performed during normal operation, and the planned maximum surveillance interval that is necessary to ensure that the channels are fully conditioned to accurately and reliably perform their functions when needed.</p>	<p>In progress as design work continues.</p> <p>Progress will be reported in next 6 month update.</p>

Open RAIs	Status
<p><b>NRC RAI-10</b></p> <p>Please provide a description of the standards, guidelines and/or criteria that will be utilized to develop procedures for inspection, maintenance, repair, operation, abnormal response, and administrative controls associated with the SFP level instrumentation, as well as storage and installation of portable instruments.</p>	<p>In progress as design work continues.</p> <p>Progress will be reported in next 6 month update.</p>
<p><b>NRC RAI-11</b></p> <p>Please provide the following:</p> <p>a) Further information describing the maintenance and testing program the licensee will establish and implement to ensure that regular testing and calibration is performed and verified by inspection and audit to demonstrate conformance with design and system readiness requirements. Please include a description of your plans for ensuring that necessary channel checks, functional tests, periodic calibration, and maintenance will be conducted for the level measurement system and its supporting equipment.</p> <p>b) A description of how the guidance in NEI 12-02 section 4.3 regarding compensatory actions for one or both non-functioning channels will be addressed.</p> <p>c) A description of what compensatory actions are planned in the event that one of the instrument channels cannot be restored to functional status within 90 days.</p>	<p>In progress as design work continues.</p> <p>Progress will be reported in next 6 month update.</p>

**6. Need for Relief/Relaxation and Basis for the Relief/Relaxation**

STPNOC expects to comply with the order implementation date and no relief/relaxation is required at this time.

**7. Potential Draft Safety Evaluation Impacts**

None