



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

November 24, 2015

Mr. Dennis L. Koehl  
President and CEO/CNO  
STP Nuclear Operating Company  
South Texas Project  
P.O. Box 289  
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - MITIGATING STRATEGIES  
ASSESSMENT WITH RESPECT TO THE REEVALUATED FLOOD HAZARDS  
SUBMITTED IN RESPONSE TO 10 CFR 50.54(f) INFORMATION  
REQUEST – FLOOD-CAUSING MECHANISM REEVALUATION (CAC  
NOS. MF1110 AND MF1111)

Dear Mr. Koehl:

The purpose of this letter is to describe the next steps following the review of the reevaluated flood hazard as directed by the Commission. Specifically, this letter addresses the next steps associated with the mitigation strategies assessment (MSA) with respect to the reevaluated flood hazard.

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter referred to as the 50.54(f) letter). The request was issued as part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to reevaluate flood-causing mechanisms using present-day methodologies and guidance. By letter dated March 11, 2013 (ADAMS Accession No. ML13079A806), STP Nuclear Operating Company (STP, the licensee) responded to this request for South Texas Project, Units 1 and 2 (STP). This response was supplemented by letters dated January 22, 2014 (ADAMS Accession No. ML14041A336) and February 13, 2014 (ADAMS Accession No. ML14056A195). By letter dated September 30, 2014 (ADAMS Accession No. ML14259A195), the NRC staff transmitted to you its staff assessment of the information provided in the above mentioned letters. The NRC staff has completed its review of the information provided.

The current flood hazard reevaluation approach is described in NRC letter dated September 1, 2015 (ADAMS Accession No. ML15174A257), concerning the coordination of requests for information regarding flooding hazard reevaluations and mitigating strategies for beyond-design-basis external events. This letter describes the changes in the NRC's approach to the flood hazard reevaluations that were approved by the Commission in its Staff Requirements Memorandum (ADAMS Accession No. ML15209A682) to COMSECY-15-0019 (ADAMS Accession No. ML15153A104) that described the NRC's mitigating strategies and flooding hazard reevaluation action plan.

D. Koehl


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As described in the staff assessment, the NRC staff confirmed that the licensee responded appropriately to Enclosure 2 of the 50.54(f) letter. The NRC staff confirmed that the reevaluated hazard results for each reevaluated flood-causing mechanism are bounded by the current design-basis flood hazard and an integrated assessment or a focused evaluation is not necessary for STP. The NRC staff has no additional information needs at this time with respect to Enclosure 2 of the 50.54(f) letter.

The September 1, 2015, letter described expectations for sites to perform an assessment of their mitigation strategies with respect to the reevaluated hazard. The licensee is expected to perform an MSA for STP. The Nuclear Energy Institute (NEI) guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" is currently being revised. This revision will include a methodology to perform an MSA with respect to the reevaluated flood hazards. The NRC staff has concluded that the licensee's reevaluated hazard information is suitable for the assessment of mitigation strategies developed in response to Order EA-12-049 (i.e., defines the mitigation strategies flood hazard information described in the revised NEI 12-06 guidance currently being finalized by the industry and NRC staff).

If you have any questions, please contact me at (301) 415-3809 or e-mail at [Juan.Uribe@nrc.gov](mailto:Juan.Uribe@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Juan Uribe', written over the word 'Sincerely,'.

Juan Uribe, Project Manager  
Hazards Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

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As described in the staff assessment, the NRC staff confirmed that the licensee responded appropriately to Enclosure 2 of the 50.54(f) letter. The NRC staff confirmed that the reevaluated hazard results for each reevaluated flood-causing mechanism are bounded by the current design-basis flood hazard and an integrated assessment or a focused evaluation is not necessary for STP. The NRC staff has no additional information needs at this time with respect to Enclosure 2 of the 50.54(f) letter.

The September 1, 2015, letter described expectations for sites to perform an assessment of their mitigation strategies with respect to the reevaluated hazard. The licensee is expected to perform an MSA for STP. The Nuclear Energy Institute (NEI) guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" is currently being revised. This revision will include a methodology to perform an MSA with respect to the reevaluated flood hazards. The NRC staff has concluded that the licensee's reevaluated hazard information is suitable for the assessment of mitigation strategies developed in response to Order EA-12-049 (i.e., defines the mitigation strategies flood hazard information described in the revised NEI 12-06 guidance currently being finalized by the industry and NRC staff).

If you have any questions, please contact me at (301) 415-3809 or e-mail at Juan.Uribe@nrc.gov.

Sincerely,

/RA/

Juan Uribe, Project Manager  
Hazards Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

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**ADAMS Accession No.: ML15314A061** **\*via email**

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