



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

January 19, 2016
NOC-AE-15003297
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
Report of Full Compliance with Order EA-12-051
Reliable Spent Fuel Pool Instrumentation

References:

1. Letter, Eric Leeds to All Power Reactor Licensees, Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, March 12, 2012 (EA-12-051) (ST-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), February 28, 2013 (NOC-AE-13002959) (ML13070A006)
3. Letter, G. T. Powell to NRC Document Control Desk, 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), August 27, 2013 (ML13249A078)
4. Letter, G. T. Powell to NRC Document Control Desk, 2nd 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) February 27, 2014 (ML14066A388)
5. Letter, G. T. Powell to NRC Document Control Desk, 3rd 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) August 27, 2014 (ML14251A028)
6. Letter, G. T. Powell to NRC Document Control Desk, 4th 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) February 26, 2015 (ML15069A220)

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7. Letter, G. T. Powell to NRC Document Control Desk, 5th 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) August 26, 2015 (ML15251A206)
8. NRC Letter, South Texas Project, Units 1 and 2 - Interim Staff Evaluation and Request For Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0827 AND MF0828), September 19, 2013 (ML13254A210)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (Reference 1) modifying licenses with regard to requirements for reliable spent fuel pool instrumentation. The Order was immediately effective and directed STP Nuclear Operating Company (STPNOC) to install reliable spent fuel pool level instrumentation. Reference 1 required submission of an overall integrated plan (OIP) and status reports at 6 month intervals pursuant to Section IV, Condition C (See References 2, 3, 4, 5, 6, and 7).

The purpose of this letter is to provide the report of full compliance with the Order EA-12-051 (Reference 1) pursuant to Section IV, Condition C.3 of the Order for South Texas Project, Units 1 and 2. Full compliance with Order EA-12-051 was achieved. See further details in Attachment 1.

The STPNOC responses providing additional information as requested in Reference 8 have been summarized in the Attachment 1. As such, STPNOC considers these items complete pending NRC closure.

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: January 19, 2016



G. T. Powell
Site Vice President

Attachment: Compliance Bases for Order EA-12-051 and Status of Requests for Information

cc:
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ATTACHMENT

Compliance Bases for Order EA-12-051 and Status of Requests for Information

Compliance Bases for Order EA-12-051 and Status of Requests for Information

Background

On March 12, 2012, the NRC issued Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool (SFP) Instrumentation (Reference 1) to STP Nuclear Operating Company (STPNOC). The Order was effective immediately and directed STPNOC to install reliable SFP instrumentation as outlined in Attachment 2 of the Order at South Texas Project (STP). The information provided herein documents full compliance by STPNOC in response to the Order.

Compliance

STPNOC has installed two independent full-scale level monitors in the STP Unit 1 and Unit 2 SFPs in response to Reference 1. Implementation includes diverse level sensors in the SFPs, backup uninterruptible power supplies (UPS), and level indicators in the radwaste control room area. Modifications and training have been completed and applicable procedures have been developed and are available for use in accordance with the site procedure control program.

STPNOC submitted STP's Overall Integrated Plan (OIP) by Reference 2. STPNOC's responses to the NRC Interim Staff Evaluation Requests for Additional Information (ISE RAIs) in Reference 8 have been addressed as documented in the correspondence referenced in the table below. The RAIs are considered complete pending NRC closure.

Actions Completed

SFP Level Instrumentation (SFPLI) required by NRC Order EA-12-051 has been implemented in both Unit 1 and Unit 2 providing SFP level monitoring capability displaying remotely in each respective unit's Radwaste Control Room.

Milestone Completion

SFPLI Milestones Unit 1 & Unit 2	Completion Date
Submit Overall Integrated Plan (Unit 1 & Unit 2)	February 28, 2013
6 Month Updates & Unit Compliance Submittals	
1 st Update	August 27, 2013
2 nd Update	February 27, 2014
3 rd Update	August 27, 2014
4 th Update	February 26, 2015
5 th Update	August 26, 2015
NRC Notification of Compliance with SFPLI Order for Unit 2	July 2, 2015
Modifications/ Implementation:	

Unit 1 Modification Design Complete	October 24, 2015
Unit 1 SFPLI Modification Implemented	November 3, 2015
Unit 2 Modifications Design Complete	April 18, 2015
Unit 2 SFPLI Modification Implemented	May 1, 2015
Programs Established:	
Training	January 2015
Procedures Issued (final changes for both units)	November 11, 2015

NRC Requests for Additional Information (RAIs)

STPNOC's response to the NRC Interim Staff Evaluation (ISE) Open Items (ISE RAIs) identified in Reference 8 have been addressed and closed as documented in References 3, 4, 5, 6, and 7 and are considered complete pending NRC Closure. Additional documents were provided to the NRC staff through the ePortal. NRC OIP Requests for Additional Information (OIP RAIs) in Reference 11 were superseded by the NRC ISE RAIs. The following table provides completion references for each ISE RAI.

RAIs	References
ISE RAI 4, 5, 6, 7, 8, 9, 12, 13, 14, 15, 18	2 nd status update (Reference 4)
ISE RAI 3, 11	3 rd status update (Reference 5)
ISE RAI 16, 17, 19	4 th status update (Reference 6)
ISE RAI 1, 2, 10	4 th and 5 th status updates (References 6, 7)

NRC Onsite Audit Questions (AQs)

The NRC Onsite Audit of STP's SFPLI implementation of Order EA-12-051 occurred the week of February 9, 2015. Three specific items remained open following the exit to include ISE RAI #1, ISE RAI #2 and ISE RAI #10. The responses to these RAIs have been revised and subsequently closed as indicated in NRC report for the Onsite Audit (Reference 10) where no NRC Open Audit Questions were identified.

References

1. Letter, Eric Leeds to All Power Reactor Licensees, Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, March 12, 2012 (EA-12-051) (ST-AE-NOC-12002271) (ML12054A679)

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9. Letter, G. T. Powell to NRC Document Control Desk, Unit 2 Notification of Compliance with Orders EA-12-049 for Mitigation Strategies for Beyond-Design-Basis External Events and EA-12-051 for Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0826 and MF0828) July 2, 2015 (ML15196A031)
10. Letter from T. Brown, NRC, to D.L. Koehl, South Texas Project, Units 1 and 2 – Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC Nos. MF0825, MF0826, MF0827, and MF0828), May 6, 2015 (ML15111A465)
11. 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), June 7, 2013 (ML131149A09)