

Mr. William T. Cottle  
President and Chief Executive Officer  
STP Nuclear Operating company  
south Texas Project Electric  
Generating Station  
P. O. Box 289  
Wadsworth, TX 77483

February 1, 2000

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - GENERIC LETTER 98-04,  
"POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING  
SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-  
COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE  
COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT" (TAC  
NOS. MA4101 AND MA4102)

Dear Mr. Cottle:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04 to all holders of operating license or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for: (a) controlling the procurement of coatings and paints used at the facility, (b) the qualification testing of protective coatings, and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
  - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design-basis loss-of-coolant accident (DBLOCA), the following information shall be provided to demonstrate compliance:

- (a) The date and findings of the last assessment of coatings, and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility; or,
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46(b)(5), "Long-term cooling," and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:
- (a) If commercial-grade coatings are being used at your facility for Service Level 1 applications, and such coatings are not dedicated or controlled under your Appendix B Quality Assurance program, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provide a letter dated November 11, 1998, for South Texas Project, Units 1 and 2. This submittal provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on December 9, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

Sincerely,

*/RA/*

John A. Nakoski, Senior Project Manager, Section 1  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50499

cc: See next page

- (a) The date and findings of the last assessment of coatings, and the planned date of the next assessment of coatings.
- (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
- (ii) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility; or,
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46(b)(5), "Long-term cooling," and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:
  - (a) If commercial-grade coatings are being used at your facility for Service Level 1 applications, and such coatings are not dedicated or controlled under your Appendix B Quality Assurance program, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provide a letter dated November 11, 1998, for South Texas Project, Units 1 and 2. This submittal provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on December 9, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

Sincerely,  
*/RA/*

John A. Nakoski, Senior Project Manager, Section 1  
 Project Directorate IV & Decommissioning  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50499

cc: See next page

DISTRIBUTION:

File Center            J. Tapia, RIV  
 PUBLIC                OGC  
 PDIV-I R/F            R. Pulsipher  
 S. Richards (clo)    C. Lauron  
 ACRS                    J. Davis

To receive a copy of this document, indicate "C" in the box								
OFFICE	PDIV-1/PM	C	PDIV-D/LA	C	EMEB/SC		PDIV-1/SC	C
NAME	JNakoski:lcc		CJamerson		ESullivan		RGramm	
DATE	01/19/00		1/18/00		1/21/00		1/28/00	

DOCUMENT NAME: C:\LTRA4101.wpd

OFFICIAL RECORD COPY

South Texas, Units 1 & 2

cc:

Mr. Cornelius F. O'Keefe  
Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 910  
Bay City, TX 77414

A. Ramirez/C. M. Canady  
City of Austin  
Electric Utility Department  
721 Barton Springs Road  
Austin, TX 78704

Mr. M. T. Hardt  
Mr. W. C. Gunst  
City Public Service Board  
P. O. Box 1771  
San Antonio, TX 78296

Mr. G. E. Vaughn/C. A. Johnson  
Central Power and Light Company  
P. O. Box 289  
Mail Code: N5012  
Wadsworth, TX 74483

INPO  
Records Center  
700 Galleria Parkway  
Atlanta, GA 30339-3064

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

D. G. Tees/R. L. Balcom  
Houston Lighting & Power Co.  
P. O. Box 1700  
Houston, TX 77251

Judge, Matagorda County  
Matagorda County Courthouse  
1700 Seventh Street  
Bay City, TX 77414

Jack R. Newman, Esq.  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, DC 20036-5869

Mr. J. J. Sheppard, Vice President  
Engineering & Technical Services  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

S. M. Head, Supervisor, Licensing  
Quality & Licensing Department  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

Office of the Governor  
ATTN: John Howard, Director  
Environmental and Natural  
Resources Policy  
P. O. Box 12428  
Austin, TX 78711

Jon C. Wood  
Matthews & Branscomb  
One Alamo Center  
106 S. St. Mary's Street, Suite 700  
San Antonio, TX 78205-3692

Arthur C. Tate, Director  
Division of Compliance & Inspection  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78756

Jim Calloway  
Public Utility Commission of Texas  
Electric Industry Analysis  
P. O. Box 13326  
Austin, TX 78711-3326