



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

June 6, 2000  
NOC-AE-00000477  
File No.: G09.16  
10CFR50.55a

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Request for Relief from ASME Boiler and Pressure Vessel Code Section XI  
Subsection IWE-2500(b) (Relief Request RR-ENG-IWE-03)

In accordance with the provisions of 10CFR50.55a(a)(3)(i), the South Texas Project requests relief from the requirements of ASME Section XI code Subsection IWE-2500(b) for the first IWE inservice inspection interval of Units 1 and 2. IWE-2500(b) states that when paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to their removal. The attached relief request describes a proposed alternative to affected portions of Subsection IWE that the South Texas Project believes will provide an acceptable level of quality and safety.

The attached relief request includes a discussion of the basis and justification for the relief request and an implementation schedule.

The South Texas Project requests Nuclear Regulatory Commission review and approval of this relief request by September 1, 2000.

If there are any questions, please contact either Mr. M. S. Lashley at (361) 972-7523 or me at (361) 972-7902.

T.J. Jordan  
Manager,  
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PLW

Attachment: Request for Relief from ASME Code Section XI Requirement Subsection IWE-2500(b) (Relief Request RR-ENG-IWE-03)

REG-001

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Washington, D.C. 20555-0001

**SOUTH TEXAS PROJECT  
UNITS 1 AND 2  
REQUEST FOR RELIEF FROM ASME BOILER AND PRESSURE  
VESSEL CODE SECTION XI SUBSECTION IWE-2500(b)  
(RELIEF REQUEST RR-ENG-IWE-03)**

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Reference Code: ASME Boiler and Pressure Vessel Code, Section XI 1992 Edition through 1992 Addenda

A. Components for Which Exemption is Requested:

(a) Name: Paint and coatings

(b) Function: Long-term protection of Class MC and metallic liners of Class CC components

(c) Class: Quality Class 3 for paint and coatings  
Class MC and metallic liners of Class CC component surfaces

B. Code Requirement from Which Relief is Requested:

The South Texas Project requests relief from ASME Section XI Code Subsection IWE-2500(b), which states:

When paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

Table IWE-2500-1 provides the examination requirements and acceptance standards for paints and coatings of Class MC and metallic liners of Class CC component surfaces.

This relief request pertains to all paint and coatings to be removed from the Class MC and metallic liners of Class CC component surfaces.

C. Basis for Relief from Code Requirements:

Existing paint and coating inspection practices at the South Texas Project provide an adequate level of quality and safety. The South Texas Project Paints and Coatings Program provides for examinations of painted surfaces, and correction of nonconforming conditions. There is little value added by examining an area that may have no visible flaws in what could be considered a "spot check."

D. Alternate Examination:

Paints and coatings on the Class MC and metallic liners of Class CC component surfaces are examined in accordance with existing plant requirements provided in the South Texas Project Paints and Coatings Program. The paint and coatings will not necessarily be visually examined just prior to removal. Local areas identified that do not meet the specified requirements are repaired and reinspected.

E. Justification for Granting Relief:

The alternative to IWE-2500(b) proposed by this relief request will provide an acceptable level of quality and safety consistent with the provisions of 10CFR50.55a(a)(3)(i). The paint and coatings on Class MC and metallic liners of Class CC component surfaces are inspected under the South Texas Project Paints and Coatings Program. Local areas identified that do not meet the specified requirements are repaired and reinspected. Therefore, inspection of paints and coatings prior to their removal from the Class MC and metallic liners of Class CC component surfaces should not be necessary.

F. Implementation Schedule:

The South Texas Project requests Nuclear Regulatory Commission approval by September 1, 2000, to implement this relief request during the first inspection interval for the IWE Program.