



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

June 6, 2000
NOC-AE-000654
File No.: G09.16
10CFR50.55a

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

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-2200(g) (Relief Request RR-ENG-IWE-02)

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-2200(g) for the first IWE inservice inspection interval of Units 1 and 2. IWE-2200(g) states that, when paint or coatings are re-applied, the condition of new paint and coatings shall be documented in the preservice examination records. The South Texas Project requests relief from the requirement to document the condition of reapplied protective coatings. The attached relief request describes a proposed alternative to the applicable parts 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
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PLW

Attachment: Request for Relief from ASME Code Section XI Subsection IWE-2200(g)
(Relief Request RR-ENG-IWE-02)

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U. S. Nuclear Regulatory Commission
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**SOUTH TEXAS PROJECT
UNITS 1 AND 2
REQUEST FOR RELIEF FROM ASME CODE
SECTION XI SUBSECTION IWE-2200(g)
(RELIEF REQUEST RR-ENG-IWE-02)**

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 Requirements from Which Relief is Requested:

ASME Section XI Code Subsection IWE-2200(g), 1992 Edition states:

When paint or coatings are reapplied, the condition of the new paint or coating shall be documented in the preservice examination records.

The South Texas Project requests relief from documenting the condition of reapplied protective coatings in the preservice examination records. This relief request pertains to all reapplied paint and coatings for the South Texas Project Class MC and metallic liners of Class CC components.

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 examination of painted surfaces, and repair of nonconforming conditions. Documenting the condition of reapplied paint and coatings in the preservice record does not increase the level of quality and safety of the reactor containment. Recording the condition of reapplied paint and coatings in the preservice record also does not substantiate the structural integrity of the reactor containment.

D. Alternate Examination:

Paint and coatings reapplied to 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 to ensure that acceptance standards are met at the time of application. Local areas identified that do not meet the specified requirements are repaired and reinspected.

E. Justification for Granting Relief:

The alternative to IWE-2200(g) proposed by this relief request will provide an acceptable level of quality and safety consistent with the provisions of 10CFR50.55(a)(3)(i).

The South Texas Project Paints and Coatings Program ensures that reapplications of paint and coatings satisfy applicable requirements. This program governs application and maintenance of paint and coatings, including inspection and quality assurance provisions. Local areas not meeting the specified requirements for paint or coatings are corrected in accordance with procedural requirements, and reinspected to ensure requirements are met. Consequently, documenting the condition of reapplied paints and coatings in the preservice examination records serves no purpose related to ensuring continued satisfactory performance of paint and coatings.

If paint or coating is found to have deteriorated while in service, the affected area is evaluated to identify corrective actions, regardless of the preservice record of the protective coating. Therefore, recording the condition of reapplied paint and coatings in the preservice record will not increase the level of quality and safety of the containment structure, and there is no value added by recording the condition in the preservice record.

F. Implementation Schedule:

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