



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

July 24, 2000
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File No.: G01
STI: 31141376

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Commitment Change Summary Report

Gentlemen:

Attached is the South Texas Project (STP) Commitment Change Summary Report for the period June 10, 1999 through June 10, 2000. This report lists each commitment for which a change was made during the reporting period and provides a basis for each change.

Each commitment was evaluated in accordance with the requirements of STP's Regulatory Commitment Change Process, which is consistent with the guidance in the Nuclear Energy Institute's "Guideline for Managing NRC Commitments", NEI 99-04. Additional documentation is available at STP for your review.

If there are any questions, please contact either Scott Head at 512/972-7136 or me at 512/972-8757.

J. J. Sheppard
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PLA

Attachment 1: Commitment Change Summary Report

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cc:

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ATTACHMENT 1
Commitment Change Summary Report

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 COMMITMENT CHANGE SUMMARY REPORT
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Condition Report Number	Source Document	Source Date	Date of Change	Original Commitment Description	Revised Commitment Description	Justification for Change
89-1278	ST-HL-AE-3254 ST-AE-HL-92243 ST-AE-HL-92452	10/12/89 9/12/89 5/4/90	2/17/00	"Procedure NDEP 3.0 "Visual Examination of Welds", will be revised to clearly define QC's role relative to surveillance of welding parameters. This procedure will provide QC monitoring of heat input welding parameters."	Monitoring of the station welding program is now the responsibility of the Quality Department and will be performed in accordance with the requirements of procedure 0PQP02-ZA-0003, "Quality Surveillance and Performance Monitoring Programs".	The responsibility for visual weld inspection was moved to the Engineering department. The responsibility for surveillance and monitoring the implementation of the welding program is the responsibility of the Quality Department in accordance with the requirements of procedure 0PQP02-ZA-0003.
99-10169	ST-AE-HL-92991 ST-HL-AE-5575 ST-AE-NOC-0347	2/26/92 2/10/97 2/17/99	9/7/99	Perform inspections of large-bore Essential Cooling Water piping for signs of leakage on a monthly basis. Perform inspections of the ground surface above buried Essential Cooling Water piping for signs of leakage on a monthly basis.	Perform inspections of large-bore Essential Cooling Water piping for signs of leakage <u>once every six months</u> . Perform inspections of the ground surface above buried Essential Cooling Water piping for signs of leakage <u>once every six months</u> .	The length of time required for a through-wall flaw to appear and observations of through-wall flaws between the time of discovery and repair indicate dealloying is a slow process. Structural integrity analysis shows very large cracks would be required to cause sudden failure at the maximum stress locations in the piping. Through-wall cracks are expected to be detected well before they reach such large sizes. A six-month comprehensive and documented inspection frequency together with more frequent but informal observations from the system engineer, operations, and maintenance personnel will identify through-wall flaws in a timely manner and will allow full compliance with the requirements of Generic Letter 90-05. Discovered flaws will be subject to appropriate compensatory actions per the guidelines in Generic Letter 90-05 including but not limited to more frequent inspections.
99-12810	ST-HL-AE-5586 ST-HL-AE-5603 ST-AE-NOC-225 ST-NOC-AE-382	2/21/97 3/13/97 8/31/98 12/14/98	9/23/99	"For subsequent steam generator eddy current inspections on the currently installed generators conducted to satisfy Technical Specification Surveillance Requirements 4.4.5.1 and 4.4.5.2, the first sample will be a 100% bobbin coil examination of the full length of all inservice tubes. Other qualified eddy current techniques may be substituted for bobbin as appropriate (e.g. +point inspection of row 1 and 2 U-bends)"	"For subsequent steam generator eddy current inspections on the Model E steam generators conducted to satisfy Technical Specification Surveillance Requirements 4.4.5.1 and 4.4.5.2, the full length of all* tubes in row 3 and higher, and the straight legs of all* tubes in rows 1 and 2, will be inspected using the bobbin coil probe. Other qualified eddy current techniques may be substituted for bobbin as appropriate. For the U-bend portions of row 1 and 2 tubes, a sampling program per NEI 97-06 and its directive guideline document "PWR Steam Generator Examination Guideline" using qualified eddy current techniques will be employed. Other qualified eddy current techniques may be substituted for bobbin as appropriate (e.g. +point inspection of row 1 and 2 U-bends)" * - Tech Spec. 4.4.5.2.b.3 applies to any tube that cannot pass the probe (e.g., due to tube ovality)	At the time of the original commitment, the relationship of the cold leg free span cracking seen during refueling outage 2RE05 and the dings which were present at these locations was not known. The 100% examination commitment, which was related to the free span cold leg cracks found during refueling outage 2RE05, was originally intended to apply to all cold leg straight length tubes where this cracking had occurred. As the Category C-3 [Technical Specification 4.4.5.2] condition associated with refueling outage 2RE05 also included typical outside diameter axial cracking in support plate crevices which was noted in letter ST-HL-AE-5586 and letter ST-HL-AE-5603, the original commitment intended to commit to examination of all tube support plate

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						<p>intersections. Special commitments on U-bend examinations were not intended. Since this time, STP Nuclear Operating Company has performed a site specific bobbin coil qualification for detection of axial cracking at dings less than 5 volts in accordance with Appendix H of the PWR Steam Generator Examination Guidelines, Revision 5 and is employing motorized rotating coil examination for dings outside the 5 volt bobbin qualification range for dings in straight leg sections or U-bends.</p> <p>The general inspection of U-bends in rows 4 and higher is by bobbin coil. Due to U-bend, the short radiuses of some row 3 tubes and the cable resistance to pushing and pulling that it causes, it may not be possible to perform a standard bobbin coil examination of 100% of the row 3 tubes U-bends. The row 1 and 2 tubes of STP Nuclear Operating Company were heat treated, after steam generator installation (prior to commercial operation) to relax residual stresses from the U-bend. This would also effect a stress relief of fabrication induced U-bend dings in row 1 and 2. For this condition, a sample inspection plan with motorized rotating coil examinations is appropriate for monitoring these tubes. The requirement to examine greater than 5-volt dings with motorized rotating coil probes also applies to the dings greater than 5 volts in row 3. This provides an appropriate sample plan for monitoring for free span cracking in row 3 tubes where bobbin coil examinations are not achieved. At the last Unit 1 and Unit 2 inspections, 100% of row 1 and 2 U-bends were +point examined. No U-bend cracking was found. The reference to 4.4.5.2.b.3 is to clarify that some portions of one or more tubes may not be inspected if the standard size bobbin coil probe cannot pass through the tube due to ovality in the U-bend area. The cited Technical Specification does not require that such a tube is plugged, but requires that an adjacent tube be inspected.</p>