



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

September 18, 2000
NOC-AE-00000929
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
Amended Request for Relief from ASME Boiler and Pressure Vessel Code Section XI
Subsections IWE-2420(b) and IWE-2420(c) (Relief Request RR-ENG-IWE-04)

Reference: Request for Relief from ASME Boiler and Pressure Vessel Code Section XI
Subsections IWE-2420(b) and IWE-2420(c) (Relief Request RR-ENG-IWE-04), T.
J. Jordan to NRC Document Control Desk, dated June 6, 2000 (NOC-AE-00000483)

Pursuant to 10CFR50.55a(a)(3)(ii), the South Texas Project requests relief from the requirements of ASME Section XI IWE-2420(b) and IWE-2420(c) for the first inspection interval of Units 1 and 2. These sections require successive examination of repaired areas. The South Texas Project requests relief because compliance with this requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The attached amended relief request provides additional justification for granting relief and extends the requested approval date. Changes in the referenced correspondence are indicated by revision bars.

The South Texas Project requests Nuclear Regulatory Commission review and approval of this relief request by December 31, 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,
Nuclear Engineering

PLW

Attachment: Request for Relief from ASME Code Section XI Requirement Subsections IWE-2420(b) and 2420(c) (Relief Request RR-ENG-IWE-04)

A047

cc:

Ellis W. Merschhoff
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Jon C. Wood
Matthews & Branscomb
112 East Pecan, Suite 1100
San Antonio, TX 78205-3692

John A. Nakoski
Addressee Only
Project Manager, Mail Stop OWFN/7-D-1
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Tae (T. J.) Kim
Addressee Only
Project Manager, Mail Code OWFN/7-D-1
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Cornelius F. O'Keefe
c/o U. S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77404-0910

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

A. H. Gutterman
Morgan, Lewis & Bockius
1800 M. Street, N.W.
Washington, DC 20036-5869

C. A. Johnson/R. P. Powers
AEP - Central Power and Light
P. O. Box 289, Mail Code: N5022
Wadsworth, TX 77483

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

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

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

**REQUEST FOR RELIEF FROM ASME BOILER AND PRESSURE
VESSEL CODE SECTION XI SUBSECTIONS IWE-2420(B) AND IWE-2420(C)
(RELIEF REQUEST RR-ENG-IWE-04)**

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

A. Components for Which Exemption is Requested:

- (a) Name: Class MC and metallic liners of Class CC components which have been repaired and found acceptable for continued service.
- (b) Function: Provide reactor containment pressure boundary integrity and leak-tightness.
- (c) Class: ASME Code Class MC and metallic liners of Class CC components

B. Code Requirement from Which Relief is Requested:

Relief is requested from the referenced ASME Section XI Code, paragraphs IWE-2420(b) and IWE-2420(c). Paragraph IWE-2420(b) states:

When component examination results require evaluation of flaws, areas of degradation, or repairs in accordance with IWE-3000, and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be reexamined during the next inspection period...

Paragraph IWE-2420(c) states:

When the reexaminations required by IWE-2420(b) reveal that the flaws, areas of degradation, or repairs remain essentially unchanged for three consecutive inspection periods, the areas containing such flaws, degradation, or repairs no longer require augmented examination...

This relief request is applicable to the successive examination of repaired areas.

C. Basis for Relief from Code Requirements:

Performing these examinations may result in increased dose to those performing the examinations. Additional expense will also be incurred. Therefore, in accordance with 10CFR50.55a(a)(3)(ii), the South Texas Project requests relief from this requirement because compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

D. Alternate Examination:

Once a repaired area is determined to meet the required specifications, successive examinations are not necessary.

E. Justification for Granting Relief:

The purpose of a repair is to restore a component to an acceptable condition for continued service in accordance with the acceptance standards of IWE-3000. IWE-3000, referenced by IWE-2420(b), provides the acceptance standards to be applied to evaluation of nondestructive examination results. IWE-3114 states that repairs and reexaminations shall comply with the requirements of IWA-4000. IWA-4150, "Verification of Acceptability," states the following:

Prior to authorizing a repair or the installation of an item to be used for replacement, the Owner shall conduct an evaluation of the suitability of the repair or item to be used for replacement including consideration of the cause of failure. In addition, when repair or replacement is required because of failure of an item, the evaluation shall consider the cause of failure of the existing item to ensure that the selected repair or replacement item is suitable.

If the repair has restored the component to an acceptable condition, successive examinations are not warranted. If the repair does not meet code requirements, then the repair is not suitable and the component is not acceptable for continued service.

Paragraphs IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require a repair to be subject to successive examination requirements. Successive examinations of repaired areas are only required under IWE-2420(b).

If a repaired area is subject to degradation, augmented examination is required in accordance with IWE-3512 for Examination Category E-C. Consequently, in the absence of such degradation, requiring successive examination of repairs in accordance with IWE-2420(b) and IWE-2420(c) constitutes a burden without a compensating increase in quality or safety.

F. Implementation Schedule:

The South Texas Project requests Nuclear Regulatory Commission approval by December 31, 2000, to implement this relief request during the first inspection interval for the IWE Program.