



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

January 8, 2001  
NOC-AE-00000969  
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 Section XI Requirements for  
Ultrasonic Examinations and Qualification of Examination Personnel  
(Relief Request RR-ENG-2-22)

In accordance with the provisions of 10CFR50.55a(a)(3)(i), the South Texas Project requests Nuclear Regulatory Commission approval of selected portions of the 1995 Edition of ASME Section XI code through the 1996 Addenda (95A96) for use as alternative criteria for performing Appendix VIII-qualified ultrasonic examinations and for qualification of examination personnel.

Based on the start dates for South Texas Project Units 1 and 2, the inservice inspection program code of record for the second inspection interval is the 1989 Edition of Section XI. However, all operating plants are required to comply with Appendix VIII of the 95A96 code as it is implemented through November 2002. The South Texas Project proposes to adopt the specified portions of Appendix I, Appendix VII, and IWA-2300 of the 95A96 code as alternatives to the corresponding portions of the 1989 Edition. The alternative requirements for ultrasonic examinations and for qualification of examination personnel will provide an acceptable level of quality and safety.

The basis and justification for the relief request and an implementation schedule are attached. The South Texas Project requests Nuclear Regulatory Commission approval of this relief request by June 30, 2001.

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

  
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Attachment: Request for Relief from ASME Section XI Requirements for Ultrasonic Examinations and Qualification of Examination Personnel  
(Relief Request RR-ENG-2-22)

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**SOUTH TEXAS PROJECT  
UNITS 1 AND 2  
REQUEST FOR RELIEF FROM ASME SECTION XI REQUIREMENTS FOR  
ULTRASONIC EXAMINATIONS AND QUALIFICATION OF EXAMINATION  
PERSONNEL (RELIEF REQUEST RR-ENG-2-22)**

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Reference Code: ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition

A. Components for Which Exemption is Requested:

- (a) Name: Components and their supports subject to nondestructive examination under the South Texas Project Inservice Inspection Program
- (b) Function: Pressure boundary and component support
- (c) Class: ASME Code Classes 1, 2, 3, MC, and CC

B. Code Requirement from Which Relief is Requested:

The South Texas Project requests Nuclear Regulatory Commission approval to use specific portions of Appendix I, Appendix VII, and IWA-2300 of the 1995 Edition of ASME Section XI code through the 1996 Addenda (95A96) code as alternatives to the corresponding portions of the 1989 Edition of Section XI.

Paragraphs I-2110(a), I-2220, and I-2300 of Appendix I of the code specify the components and types of welds within components that must be ultrasonically examined with Appendix VIII-qualified techniques. Appendix VII and IWA-2300 of the code define the qualification and certification requirements, including annual training requirements, for ultrasonic examination personnel qualified under Appendix VIII.

C. Basis for Relief from Code Requirements:

10CFR50.55a(g)(6)(ii)(C) requires compliance with Appendix VIII of the 95A96 Section XI code, although the modification of Appendix VIII contained in 10CFR50.55a(b)(2)(xiv) through (xvi) may be applied. This regulation requires that Appendix VIII be implemented according to the specified schedule. Based on the South Texas Project second interval start dates, the Section XI code of record for the second interval is the 1989 Edition. Appendix I, Appendix VII, and IWA-2300 in the 1989 Edition are not as consistent and compatible with Appendix VIII as they are in the 95A96 code. Implementation of the specified portions of Appendix I, Appendix VII, and IWA-2300 of the 95A96 Section XI code will provide the necessary consistency and compatibility with Appendix VIII.

D. Alternative Requirements:

10CFR50.55a(g)(6)(ii)(C) requires Appendix VIII of the 95A96 code to be implemented beginning with the second interval of the South Texas Project inservice inspection program. Appendix VIII, "Performance Demonstration for Ultrasonic Examination Systems," was published in Section XI after issuance of the 1989 Edition. Appendix I, "Ultrasonic Examinations," Appendix VII, "Qualification of Nondestructive Examination Personnel for Ultrasonic Examination," and IWA-2300, "Qualification of Nondestructive Examination Personnel," were revised in the 95A96 code to correlate and interface with the requirements of Appendix VIII of Section XI. Appendix I, Appendix VII, and IWA-2300 were revised in the areas of: classification of equipment for application of ultrasonic examination requirements; and, qualification and training requirements for certification of nondestructive examination personnel for ultrasonic examination.

To ensure compatibility with Appendix VIII, the South Texas Project proposes to use paragraphs I-2110(a), I-2220, and I-2300 of Appendix I, Appendix VII, and IWA-2300 of the 95A96 Section XI code as alternatives to the corresponding portions of the 1989 Edition of Section XI during the second interval.

For the sake of consistency and uniformity, the requirements of Appendix VII and IWA-2300 will be incorporated into the South Texas Project procedures for nondestructive examination personnel qualification and certification and applied to all applicable examination methods.

All other requirements of the 1989 Section XI code remain unchanged except as may be modified by code cases or other relief requests specified in the inservice inspection program.

E. Justification for Granting Relief:

The revisions to the 10CFR50.55a regulation that became effective on November 22, 1999, approved the 95A96 Section XI code for use and required expedited implementation of Appendix VIII of the 95A96 code for all operating plants. The South Texas Project is just beginning its second inspection interval with the 1989 Edition of Section XI as its code of record. Because implementation of Appendix VIII of the 95A96 code is required, the South Texas Project believes paragraphs I-2110(a), I-2220, and I-2300 of Appendix I, Appendix VII, and IWA-2300 in the 95A96 code should be adopted into the inservice inspection program in order to have a consistent and complete program.

10CFR50.55a(g)(4)(iv) allows use of portions of subsequent approved code editions and addenda [i.e., those incorporated by reference in 10CFR50.55a(b)] subject to its limitations and modifications, subject to Nuclear Regulatory Commission approval, and provided all related requirements are met. The 95A96 Section XI Code has been incorporated by reference in 10CFR50.55a(b) by the Nuclear Regulatory Commission.

10CFR50.55a(b)(2) contains no limitations or modifications related to Appendix I, Appendix VII, or IWA-2300. All portions of the 95A96 Section XI code related to Appendix VIII and to nondestructive examination personnel qualification and certification are included in this relief request.

In accordance with 10CFR50.55a(a)(3)(i), the South Texas Project requests Nuclear Regulatory Commission approval of the proposed alternative to use paragraphs I-2110(a), I-2220, and I-2300 of Appendix I, Appendix VII, and IWA-2300 of the 95A96 Section XI code instead of the corresponding portions of the 1989 Edition. The proposed alternatives will provide an acceptable level of quality and safety.

F. Implementation Schedule:

The South Texas Project requests Nuclear Regulatory Commission review and approval of this relief request by June 30, 2001.