



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

August 15, 2001
NOC-AE-01001151
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
Supplement to Request for Relief from ASME Section XI Requirements for
Ultrasonic Examinations and Qualification of Examination Personnel
(Relief Request RR-ENG-2-22)

Reference: "Request for Relief from ASME Section XI Requirements for Ultrasonic Examinations and Qualification of Examination Personnel (Relief Request RR-ENG-2-22)," T. J. Jordan to NRC Document Control Desk, dated January 8, 2001 (NOC-AE-00000969)

In accordance with the provisions of 10CFR50.55a(a)(3)(i), the South Texas Project has requested 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.

As stated in the referenced correspondence, 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 attachment to this letter contains information supplemental to that provided in the referenced correspondence. The supplemental information addresses the following:

- The South Texas Project will comply with the requirements of 10CFR50.55a(b)(2)(xiv) through (xvi) and meet the schedule requirements of 10CFR50.55a(g)(6)(ii)(c);
- The NDE personnel qualification and certification requirements of the 95A96 Section XI code will not be applied to NDE personnel performing preservice examinations of the South Texas Project Unit 2 replacement steam generators currently being fabricated in Europe;
- Application of Appendix VII and IWA-2300 for NDE qualification and certification requirements is specified;

A047

- Conditions are specified for suitability of code cases and relief requests to be used in modifying compliance with the Section XI code requirements; and
- The requested approval date has been changed to September 7, 2001.

The basis and justification for the relief request and an implementation schedule are attached. New information is identified by change bars.

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,
Engineering

PLW/

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

cc:

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

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

Mohan C. Thadani
Addressee Only
U. S. Nuclear Regulatory Commission
Project Manager, Mail Stop OWFN/7-D-1
Washington, DC 20555

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

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

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

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

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

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

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

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

C. A. Johnson/R. P. Powers
AEP - Central Power and Light Company
P. O. Box 289, Mail Code: N5012
Wadsworth, TX 77483

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

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

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 (UT only) and IWA-2300 of the code define the qualification and certification requirements, including annual training requirements, for NDE personnel.

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:

The South Texas Project will implement Appendix VIII in accordance with the schedule required by 10CFR50.55a(g)(6)(ii)(C) and as modified by 10CFR50.55a(b)(2)(xiv)

through (xvi). References to 10CFR50.55a are to the version of this regulation as published in the Code of Federal Regulations as of the transmittal date of this letter.

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. The South Texas Project will apply these 95A96 qualification and certification requirements to NDE personnel who perform Section XI preservice and inservice examinations during the second inspection interval except for the preservice examinations of the tubing and of the shell and nozzle welds of Unit 2 replacement steam generators currently being fabricated in Europe. Existing contractual arrangements for preservice examinations in the fabricator's shop, including NDE methodology and NDE personnel qualification and certification requirements, are based on the 1989 Edition of Section XI code.

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

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 September 7, 2001.