July 19, 1990

Docket Nos. 50-498
and 50-499

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Mr. Donald P. Hall
Group Vice-President, Nuclear
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77251

Dear Mr. Hall:

SUBJECT: ISSUANCE OF AMENDMENT NOS. 18 AND 8 TO FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80 - SOUTH TEXAS PROJECT, UNITS 1 AND 2 (TAC NOS. 73576 AND 73577)

The Commission has issued the enclosed Amendment Nos. 18 and 8 to Facility Operating License Nos. NPF-76 and NPF-80 for the South Texas Project, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated June 28, 1989, as supplemented on November 29, 1989.

The amendments change the Appendix A Technical Specifications pertaining to the reactor containment building.

A copy of the Safety Evaluation supporting the amendments is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original Signed By

George F. Dick, Jr., Project Manager
Project Directorate IV-2
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 18 to NPF-76
2. Amendment No. 8 to NPF-80
3. Safety Evaluation

cc w/enclosures:
See next page

OFC	:PDIV-2/LA	:PDIV-2	:OGC	:PDIV-2/D	:	:
NAME	:EPeyton	:GDick:	:	:CGrimes	:	:
DATE	:6/21/90	:6/21/90	:6/25/90	:6/26/90	:	:

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Document Name: STP AMENDMENT 73576/73577

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cc w/enclosures:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

HOUSTON LIGHTING & POWER COMPANY

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

CENTRAL POWER AND LIGHT COMPANY

CITY OF AUSTIN, TEXAS

DOCKET NO. 50-498

SOUTH TEXAS PROJECT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 18
License No. NPF-76

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Houston Lighting & Power Company* (HL&P) acting on behalf of itself and for the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and City of Austin, Texas (COA) (the licensees) dated June 28, 1989, as supplemented on November 29, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

*Houston Lighting & Power Company is authorized to act for the City Public Service Board of San Antonio, Central Power and Light Company and City of Austin, Texas and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-76 is hereby amended to read as follows:

   2. Technical Specifications

      The Technical Specifications contained in Appendix A, as revised through Amendment No. 18, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George F Dick Jr

for Christopher I. Grimes, Director
Project Directorate IV-2
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 19, 1990

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

HOUSTON LIGHTING & POWER COMPANY

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

CENTRAL POWER AND LIGHT COMPANY

CITY OF AUSTIN, TEXAS

DOCKET NO. 50-499

SOUTH TEXAS PROJECT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 8
License No. NPF-80

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Houston Lighting & Power Company* (HL&P) acting on behalf of itself and for the City Public Service Board of San Antonio (CPS), Central Power and Light Company (CPL), and City of Austin, Texas (COA) (the licensees) dated June 28, 1989, as supplemented on November 29, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

*Houston Lighting & Power Company is authorized to act for the City Public Service Board of San Antonio, Central Power and Light Company and City of Austin, Texas and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-80 is hereby amended to read as follows:

   2. Technical Specifications

      The Technical Specifications contained in Appendix A, as revised through Amendment No. 8, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George F. Dick Jr.

for Christopher I. Grimes, Director
Project Directorate IV-2
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 19, 1990

ATTACHMENT TO LICENSE AMENDMENT NOS. 18 AND 8

FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

DOCKET NOS. 50-498 AND 50-499

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

Remove	Insert
3/4 6-9	3/4 6-9
3/4 6-10	3/4 6-10
3/4 6-11	3/4 6-11
--	3/4 6-11a
--	3/4 6-11b

LIMITING CONDITION FOR OPERATION

3.6.1.7 Each containment purge supply and exhaust isolation valve shall be OPERABLE and:

a. Each 48-inch containment shutdown purge supply and exhaust isolation valve shall be closed and sealed closed, and

b. The 18-inch supplementary containment purge supply and exhaust isolation valves shall be closed to the maximum extent practicable but may be open for supplementary purge system operation for pressure control, for ALARA and respirable air quality considerations for personnel entry and for surveillance tests that require the valves to be open.

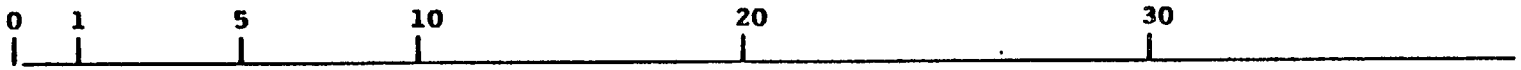
APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With a 48-inch containment purge supply and/or exhaust isolation valve open or not sealed closed, close and/or seal close that valve or isolate the penetration(s) within 4 hours, otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With the 18-inch supplementary containment purge supply and/or exhaust isolation valve(s) open for reasons other than given in Specification 3.6.1.7.b. above, close the open 18-inch valve(s) or isolate the penetration(s) within 4 hours, otherwise be in at least HOT STANDBY within the next 6 hours, and in COLD SHUTDOWN within the following 30 hours.

c. With a containment purge supply and/or exhaust isolation valve(s) having a measured leakage rate in excess of the limits of Specifications 4.6.1.7.2 and/or 4.6.1.7.3, restore the inoperable valve(s) to OPERABLE status or isolate the penetrations so that the measured leakage rate does not exceed the limits of Specifications 4.6.1.7.2 and/or 4.6.1.7.3 within 24 hours, otherwise be in at least HOT STANDBY within the next 6 hours, and in COLD SHUTDOWN within the following 30 hours.



TIME AFTER INITIAL STRUCTURAL INTEGRITY TESTING OF CONTAINMENT, YEARS

(Liftoff Testing Schedule, Containment No. 1)

TIME AFTER INITIAL STRUCTURAL INTEGRITY TESTING OF CONTAINMENT, YEARS

(Liftoff Testing Schedule, Containment No. 2)

UNIT 1 I.S.I.T - MARCH 1987
UNIT 2 I.S.I.T - SEPTEMBER 1988

Figure 4.6-1

Schedule for Lift-off Testing

SURVEILLANCE REQUIREMENTS (Continued)

5) The chemical properties of the filler material are within the tolerance limits specified as follows:

Water Content	0 - 10% (by dry wt.)
Chlorides	0 - 10 ppm
Nitrates	0 - 10 ppm
Sulfides	0 - 10 ppm
Reserved Alkalinity (Base Number)	50% of the installed value; 0 (for older grease)

Failure to meet requirement of 4.6.1.6.1.d shall be considered as an indication of abnormal degradation of the containment structure.

4.6.1.6.2 End Anchorages and Adjacent Concrete Surfaces. As an assurance of the structural integrity of the containment(s), tendon anchorage assembly hardware (such as bearing plates, stressing washers, wedges, and buttonheads) of all tendons selected for inspection shall be visually examined. During combined inspection (See Figure 4.6-1), for the containment not having full inspection, only visual inspection need to be performed. The sample size for visual only inspection is the same as for full inspection (see 4.6.1.6.1.a). Tendon anchorages selected for inspection shall be visually examined to the extent practical without dismantling the load bearing components of the anchorages. Bottom grease caps of all vertical tendons shall be visually inspected to detect grease leakage or grease cap deformations. The surrounding concrete should also be checked visually for indication of any abnormal condition.

Significant grease leakage, grease cap deformation or abnormal concrete condition shall be considered as an indication of abnormal degradation of containment structure.

4.6.1.6.3 Containment Surfaces. The exterior surface of the containment(s) should be visually examined to detect areas of large spall, severe scaling, D-cracking in an area of 25 sq. ft. or more, other surface deterioration or disintegration, or significant grease leakage, each of which can be considered as evidence of abnormal degradation of structural integrity of the containment(s).

SURVEILLANCE REQUIREMENTS (Continued)

b. Performing tendon detensioning, inspections, and material tests on a previously stressed tendon. Two tendons, one from each group shall be detensioned each time lift-offs are performed per Figure 4.6-1. A randomly selected tendon shall be completely detensioned in order to identify broken or damaged wires and determining that over the entire length of the removed wire sample (which should include the broken wire if so identified) that:

1) The tendon wires are free of corrosion, cracks, and damage, and

2) A minimum tensile strength of 240,000 psi (guaranteed ultimate strength of the tendon material) exists for at least three wire samples (one from each end and one at mid-length) cut from each removed wire.

Failure to meet the requirements of 4.6.1.6.1.b shall be considered as an indication of abnormal degradation of the containment structure.

c. Performing tendon retensioning of those tendons detensioned for inspection to at least the force level recorded prior to detensioning or the predicted value, whichever is greater, with the tolerance within minus zero to plus six percent (6%), but not to exceed 70% of the guaranteed ultimate tensile strength of the tendons. During retensioning of these tendons, the changes in load and elongation should be measured simultaneously at a minimum of three approximately equally spaced levels of force. If the elongation corresponding to a specific load differs by more than 10% from that recorded during the installation, an investigation should be made to ensure that the difference is not related to wire failures. This condition shall be considered as an indication of abnormal degradation of the containment structure.

d. Verifying the OPERABILITY of the sheathing filler grease by assuring:

1) There are no changes in the presence or physical appearance of the sheathing filler-grease including the presence of free water.

2) Amount of grease replaced in excess of the grease removed does not exceed 5% of the net duct volume, when injected at a pressure not to exceed the designer's specifications.

3) Minimum grease coverage exists for the different parts of the anchorage system.

4) General visual examination of the containment exterior surface does not exhibit the grease leakage that could affect containment integrity, and

SURVEILLANCE REQUIREMENTS (Continued)

1) If the measured prestressing force of the selected tendon in a group lies above the prescribed lower limit, the lift-off test is considered to be a positive indication of the sample tendon's acceptability.

2) If the measured prestressing force of the selected tendon in a group lies between the prescribed lower limit and 90% of the prescribed lower limit, two tendons, one on each side of this tendon shall be checked for their prestressing forces. If the prestressing forces of these two tendons are above 95% of the prescribed lower limits for the tendons, all three tendons shall be restored to the required level of integrity, and the tendon group shall be considered as acceptable. If the measured prestressing force of any two tendons falls below 95% of the prescribed lower limits of the tendons, additional lift-off testing shall be done to detect the cause and extent of such occurrence. The conditions shall be considered as an indication of abnormal degradation of the containment structures.

3) If the measured prestressing force of any tendon lies below 90% of the prescribed lower limit, an engineering investigation will be performed to determine the cause and extent of the occurrence. The condition shall be considered as an indication of abnormal degradation of the containment structure.

4) If the average of all measured prestressing forces for each group (corrected for average condition) is found to be less than the minimum required prestress level at the anchorage location for that group, the condition shall be considered as abnormal degradation of the containment structure.

5) If from consecutive surveillances, the measured prestressing forces for the same tendon or tendons in a group indicate a trend of prestress loss larger than expected and the resulting prestressing forces will be less than the minimum required for the group before the next scheduled surveillance, additional lift-off testing shall be done so as to determine the cause and extent of such occurrence. The condition shall be considered as an indication of abnormal degradation of the containment structure.

6) Unless there is abnormal degradation of the containment during the first three inspections, the sample population for subsequent inspections shall include at least 6 tendons (3 hoop, 3 inverted U).

CONTAINMENT STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment(s) shall be maintained at a level consistent with the acceptance criteria in Specification 4.6.1.6.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With the abnormal degradation indicated by the conditions in Specification 4.6.1.6.1a.4, restore the containment(s) to the required level of integrity or verify that containment integrity is maintained within 72 hours and perform an engineering evaluation of the containment(s) and provide a Special Report to the Commission within 15 days in accordance with Specification 6.9.2 or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With the indicated abnormal degradation of the structural integrity other than ACTION a. at a level below the acceptance criteria of Specification 4.6.1.6, restore the containment(s) to the required level of integrity or verify that containment integrity is maintained within 15 days, perform an engineering evaluation of the containment(s) and provide a Special Report to the Commission within 30 days in accordance with Specification 6.9.2 or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.1.6 CONTAINMENT PRESTRESSING SYSTEM

The structural integrity of the prestressing tendons of the containment shall be demonstrated at the end of 1, 3, and 5 years following the initial containment structural integrity test and at 5-year intervals thereafter. The inspection schedule for lift-off testing shall be as shown in Figure 4.6-1.

4.6.1.6.1 The adequacy of prestressing forces in tendons shall be demonstrated by:

a. Determining that a random but representative sample of at least 10 tendons (6 hoop, 4 interverted U) each have an observed lift-off force within predicted limits established for each tendon. For each subsequent inspection, one tendon from each group shall be kept unchanged to develop a history and to correlate the observed data. The procedure of inspection and the tendon acceptance criteria shall be as follows:

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 18 AND 8 TO

FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

HOUSTON LIGHTING & POWER COMPANY

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

CENTRAL POWER AND LIGHT COMPANY

CITY OF AUSTIN, TEXAS

DOCKET NOS. 50-498 AND 50-499

SOUTH TEXAS PROJECT, UNITS 1 AND 2

INTRODUCTION

By application dated June 28, 1989, as supplemented on November 29, 1989 (Ref. 1, 2), Houston Lighting & Power Company, et. al., (the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License Nos. NPF-76 and NPF-80) for the South Texas Project, Units 1 and 2. The proposed changes would revise the surveillance requirements for the reactor containment building.

DISCUSSION

The South Texas Project (STP) consists of two concrete reactor containments. The cylindrical wall and hemispherical dome of each containment are post-tensioned with high strength tendons, while the containment mat is conventionally reinforced. There are 96 inverted U-tendons and 133 hoop tendons in each containment. Each tendon consists of 186-1/4 in. diameter wires inserted into a sheet metal duct and the associated anchorage components (bearing plates, shims, anchor heads, etc.). The tendons are protected from corrosion by filling the tendon ducts with corrosion inhibiting grease. The tendons are initially tensioned to approximately 70 percent of their minimum Guaranteed Ultimate Tensile Strength (GUTS).

Regulatory Guide 1.35 delineates the provisions for In-Service Inspection of Ungrouted Tendons in Prestressed Concrete Containments. The present Technical Specification for tendon surveillance requirements for the two units of the STP are based on Rev. 2 of the Regulatory Guide. A "For Comment" version of

Revision 3 of the guide was published in April 1979. The final version of Revision 3 of the guide is expected to be published in July of 1990. Subsection IWL of ASME B&PV, Section XI was published in January 1989. This Subsection includes the requirements for inservice inspection of ungrouted prestressing tendon in prestressed concrete containments. With a few exceptions, the requirements in Subsection IWL are similar to the provisions of Revision 3 of Regulatory Guide 1.35. The staff has also prepared a sample technical specification (STS) related to the tendon surveillance. The STS incorporates the provision of Regulatory Guide 1.35 (Rev. 3) and incorporates the LCOs commensurate with the type of degradations observed during an inspection.

EVALUATION

The following is a discussion of the major Technical Specification (TS) changes.

Section 3.6.1.6 - Limiting Condition of Operation (LCO)

The existing LCO requirements are based on the Standard Technical Specification existing at the time of the licensing of the STP. Since then, the staff has initiated a number of studies (Ref. 3, 4) related to the technical content of Regulatory Guide 1.35. As a result of those studies, the staff had decided that the current LCO is too demanding for plant shutdown. The staff had developed an LCO which would reflect a reasonable condition for shutdown of the plant in the STS. In the proposed TS, the licensee adopts the staff recommended position and provides a strong justification for making the change. This change is thus acceptable to the staff.

Section 4.6.1.6 - Surveillance Requirements

Two Containments at a Site - The existing TS requires the licensee to perform a full inspection for both the STP containments. The staff position allows the licensee to perform full inspection on one containment, with only visual inspection on the other. However, the full inspection must be performed on an alternating basis. The licensee opts to take advantage of the relaxation. This proposed change is acceptable to the staff.

The inspection on alternate basis is conditioned upon a premise that the tendons in both containments are from a single population. Therefore, if a significant degradation is found in one containment during its full inspection, a similar degradation is automatically assumed in the second containment. Both the containments would require evaluation.

Section 4.6.1.6.1.a, b, and c - Adequacy of Prestressing Forces

Number of Tendons and Frequency of Inspection - Except as modified by the acknowledgement of two containments onsite, the frequency of inspection remains the same in the proposed TS. The number of tendons to be inspected in the existing TS are arbitrary numbers. The STS specifies these numbers as a percentage of the tendon population in each group. The proposed TS adopts the STS. These changes are thus acceptable.

Tendon Prestress Force Acceptance Criteria - The existing TS is based on one sided approach of monitoring prestressing forces. Based on the experience with the tendon testing, the STS provides multiple ways of establishing the adequacy of the prestressing forces (i.e., individual tendon evaluation, average tendon evaluation and trend of common tendons). With a few minor and acceptable changes, the licensee adopts the STS position. This is acceptable to the staff.

Section 4.6.1.6.1.d - Operability of Sheathing Filler Grease

The existing TS of STP can be considered as incomplete. Based on the experience with the use of the sheathing filler grease, the STS includes the provisions for monitoring chemical properties and water in the grease. The licensee proposes to adopt these additional provisions. The licensee had originally proposed that the amount of grease replaced in excess of the grease removed be changed from the present value of 5 percent to 10 percent. By letter dated February 14, 1990 (Ref. 5), the licensee withdrew that portion of the proposed changes. The value of excess grease remains at 5 percent.

Section 4.6.1.6.1 - End Anchorages and Adjacent Concrete Surfaces

The existing TS and the proposed TS have similar requirements for examining the anchorages and adjacent concrete surfaces except for the changes that reflect the examination requirements for two containments at a site as discussed earlier. The proposed TS requirement is thus acceptable to the staff.

Section 4.6.1.6.3 - Containment Surfaces

The existing TS requires the examination of containment surfaces during Type A leak rate testing when the containment is at its maximum pressure. The STS provides a specific guideline for determining significant degradation and leaves it up to the licensee to determine if the visual inspection be performed during Type A test or during tendon surveillance. In the proposed TS, the licensee adopts to perform the visual examination of the exterior concrete surfaces during tendon surveillances. However, a general inspection of the interior surfaces shall be performed prior to Type A tests. This is acceptable to the staff.

SUMMARY

Based on the review of the proposed changes in the Technical Specifications for surveillance of prestressing tendons in prestressed concrete containments with respect to the staff developed Sample Technical Specification, the staff concludes that: (1) the proposed TSs will be effective in ensuring the containment structural integrity; and (2) the revised TSs are consistent with and support the conclusions of the original Safety Evaluation. The proposed changes to the TSs are, therefore, acceptable.

ENVIRONMENTAL CONSIDERATION

The amendments involve a change in a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

CONCLUSION

Based upon its evaluation of the proposed changes to the South Texas Project, Units 1 and 2, Technical Specifications, the staff has concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public. The staff, therefore, concludes that the proposed changes are acceptable.

Date: July 19, 1990

Principal Contributor: H. Ashar

REFERENCE

1. Application for amendments to Licenses NPF-76 and NPF-80 modifying Technical Specification Section 4.6.1.6.1, dated June 28, 1989.

2. Application for amendments to Licenses NPF-76 and NPF-80 revising Technical Specification requirements 3.6.1.6 and 4.6.1.6, dated November 29, 1989.

3. NUREG/CR-2719, "Evaluation of Inservice Inspections of Greased Prestressing Tendons," September 1982.

4. NUREG/CR-4712, "Regulatory Analysis of Regulatory Guide 1.35 (Revision 3, Draft 2) - Inservice Inspection of Ungrouted Tendons in Prestressed Concrete Containments," February 1987.

5. Letter from licensee withdrawing request for change in sheathing filler grease requirement surveillance, February 14, 1990.