



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

September 4, 2002
NOC-AE-02001397
File No.: G25
STI: 31485806
10CFR50.55a

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Implementation of Approved Relief Request RR-ENG-2-15 for
Inspection of Insulated Piping (ASME Section XI, IWA-5242(a))

- References:
- 1) Letter from J. J. Sheppard to NRC Document Control Desk, dated October 7, 1999 (NOC-AE-000625)
 - 2) Letter from Nuclear Regulatory Commission to William T. Cottle, STP Nuclear Operating Company, dated January 31, 2001

In accordance with the provisions of 10CFR50.55a(a)(3)(ii), the South Texas Project requested partial relief from the ASME Section XI visual requirements of IWA-5242(a) consistent with ASME Section XI code case N-616 (reference 1). IWA-5242(a) states that for systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure-retaining bolted connections for VT-2 visual examination. For insulation left in place, one of the concerns identified by the NRC is that hold time at test pressure be sufficient to allow any leaks to be detected.

The Nuclear Regulatory Commission approved the South Texas Project request (reference 2), specifying that a four-hour hold time be used (after attaining test pressure and temperature). The South Texas Project affirms that a four-hour hold time will be applied in pressure tests of insulated, borated water systems.

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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PLW

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cc:
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