



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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