

March 15, 2005

Mr. James J. Sheppard
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - RE: REQUEST FOR RELIEF
RR-ENG-IWE-07 FROM REQUIREMENTS OF THE AMERICAN SOCIETY OF
MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE
(TAC NOS. MC4232 AND MC4233)

Dear Mr. Sheppard:

By letter dated August 25, 2004, STP Nuclear Operating Company (STPNOC) requested relief from certain requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) associated with the inspection of the steel containment liner at South Texas Project, Units 1 and 2 (RR-ENG-IWE-07). The relief request would allow the substitution of a "General Visual Examination" for the required VT-3 examination. During a February 16, 2005 telephone conference between the U.S Nuclear Regulatory Commission (NRC) and the STPNOC staffs, it was determined that the reason for the relief request was that certain areas of the containment liner were inaccessible for a VT-3 examination; STPNOC had been using a visual device (e.g. binoculars) to provide the equivalent of a VT-3 examination in these areas. The NRC advised STPNOC, at that time, that use of a visual device to provide the equivalent of a VT-3 examination was acceptable under the current, applicable, ASME Code and that no code relief was needed. Subsequently, by letter dated February 28, 2005, STPNOC withdrew the August 25, 2004 relief request.

If you have any additional questions concerning this issue, please contact me at 301-415-1439.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

cc: See next page

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South Texas Project, Units 1 & 2

cc:

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

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

Mr. J. J. Nesrsta
Mr. R. K. Temple
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Mr. C. A. Johnson/ R. P. Powers
AEP Texas Central Company
P. O. Box 289
Mail Code: N5022
Wadsworth, TX 77483

INPO
Records Center
700 Galleria Parkway
Atlanta, GA 30339-3064

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

D. G. Tees/R. L. Balcom
Texas Genco, LP
P. O. Box 1700
Houston, TX 77251

Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
Bay City, TX 77414

A. H. Gutterman, Esq.
Morgan, Lewis & Bockius
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Mr. T. J. Jordan, Vice President
Engineering & Technical Services
STP Nuclear Operating Company
P. O. Box 289
Wadsworth, TX 77483

S. M. Head, Manager, Licensing
STP Nuclear Operating Company
P. O. Box 289, Mail Code: N5014
Wadsworth, TX 77483

Environmental and Natural Resources
Policy Director
P. O. Box 12428
Austin, TX 78711-3189

Jon C. Wood
Cox Smith Matthews
112 East Pecan, Suite 1800
San Antonio, TX 78205

Director
Division of Compliance & Inspection
Bureau of Radiation Control
Texas Department of State Health Services
1100 West 49th Street
Austin, TX 78756

Brian Almon
Public Utility Commission
William B. Travis Building
P. O. Box 13326
1701 North Congress Avenue
Austin, TX 78701-3326

November 2004

Susan M. Jablonski
Office of Permitting, Remediation
and Registration
Texas Commission on
Environmental Quality
MC-122
P.O. Box 13087
Austin, TX 78711-3087

Mr. Terry Parks, Chief Inspector
Texas Department of Licensing
and Regulation
Boiler Division
P. O. Box 12157
Austin, TX 78711

Mr. Ted Enos
4200 South Hulen
Suite 630
Ft. Worth, Texas 76109