



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

September 28, 2006
NOC-AE-06002068
File No.: G25
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 1 and 2
Docket No. STN 50-498, STN 50-499
Response to Request for Additional Information:
Proposed Alternative to ASME Section XI Requirements for
Application of a Weld Overlay (RR-ENG-2-43) (TAC Nos. MD1414-1423)

- References: (1) Letter dated May 1, 2006, from M. J. Berg, STPNOC, to NRC Document Control Desk, "Proposed Alternative to ASME Section XI Requirements for Application of a Weld Overlay (RR-ENG-2-43)," (NOC-AE-06002000)
- (2) Letter dated August 22, 2006, from M. J. Berg, STPNOC, to NRC Document Control Desk, "Response to Request for Additional Information on Proposed Alternative to ASME Section XI Requirements for Application of a Weld Overlay (RR-ENG-2-43) (TAC Nos. MD1414-1423)," (NOC-AE-06002055)"
- (3) Letter dated September 19, 2006, from David W. Rencurrel, STPNOC, to NRC Document Control Desk, "Commitment in Support of Proposed Alternative to ASME Section XI Requirements for Application of a Weld Overlay (RR-ENG-2-43) (TAC Nos. MD1414-1423)," (NOC-AE-06002066)

STP Nuclear Operating Company (STPNOC) provides the attached responses to NRC questions regarding requested alternatives to the requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI for installation and examination of full structural weld overlays for dissimilar metal and safe end-to-piping stainless steel (SS) butt welds. Reference 1 is the initial request for relief, and reference 2 is the response to the first set of NRC questions. Reference 2 includes commitments to perform flaw evaluations and shrinkage stress effects analyses and to submit a final evaluation report. Reference 3 provides a commitment to provide inspection results following completion of the weld overlays. To provide clarification of actions to be taken by STPNOC, these previously stated commitments are re-issued with appropriate rewording to address the NRC request for additional information (RAI) received September 21, 2006.

STPNOC will complete stress analysis summaries of the pre-emptive weld overlay prior to restart of Unit 1 and will provide the summaries to the NRC within four weeks after restart from the Unit 1 (Fall 2006) refueling outage. Similarly, stress analysis summaries will be completed prior to the restart of Unit 2 and provided to the NRC within four weeks after restart from the Unit 2 (Spring 2007) refueling outage. This commitment supports the response to RAI #2.

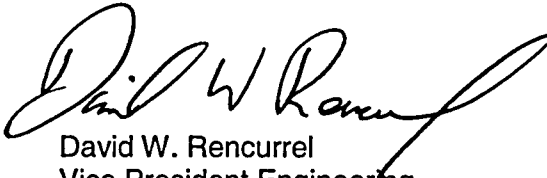
For each unit, STPNOC will provide the weld overlay ultrasonic examination results to the NRC. Included in the results will be a discussion of any repairs to the overlay material and/or base metal and the reason for the repair. The results will be submitted within 14 days after completion of the last ultrasonic examination of the weld overlays for each unit. This commitment addresses RAI #2.

Data provided in the report will include disposition of indications using ASME Section XI standards. Subsequent inservice examination of the structural weld overlays will be in accordance with ASME Section XI, Appendix Q, Q-4300. This commitment addresses RAI #1.

The restated commitments are listed in the attachments.

To support activities to be performed in the Unit 1 Fall 2006 refueling outage, NRC approval of the subject relief request is requested by October 2, 2006.

If you have any questions, please contact either Mr. P. L. Walker at (361) 972-8392 or me at (361) 972-7867.



David W. Rencurrel
Vice President Engineering
& Strategic Projects

PLW

Attachment: List of Commitments

cc:
(paper copy)

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

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

Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

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

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

Steve Winn
Christine Jacobs
Eddy Daniels
NRG South Texas LP

C. Kirksey
City of Austin

J. J. Nesrsta
R. K. Temple
E. Alarcon
City Public Service

Jon C. Wood
Cox Smith Matthews

LIST OF COMMITMENTS

The following table identifies the actions in this document to which the STP Nuclear Operating Company (STPNOC) has committed. Statements in this submittal with the exception of those in the table below are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Philip Walker at (361) 972-8392.

Commitment	Expected Completion Dates	CR Action Nos.
<p>STPNOC will complete stress analysis summaries of the pre-emptive weld overlay prior to restart of Unit 1 and provide the summaries to the NRC within four weeks after restart from the Unit 1 (Fall 2006) refueling outage.</p> <p>Similarly, stress analysis summaries will be completed prior to the restart of Unit 2 and provided to the NRC within four weeks after restart from the Unit 2 (Spring 2007) refueling outage.</p>	<p>11/28/2006 (Unit 1) 05/28/2007 (Unit 2)</p>	<p>05-15744-42 05-15744-44</p>
<p>For each unit, STPNOC will provide the pre-emptive weld overlay ultrasonic examination results to the NRC within 14 days after completion of UT examination of the weld overlays. The results will include:</p> <ul style="list-style-type: none"> • A list of indications detected. ¹ • The disposition of all indications using the standards of ASME Section XI, IWB-3514-2 and/or IWB-3514-3 criteria, and • The type and nature of the indications, if possible. ² <p>Included in the results will be a discussion of any repairs to the overlay material and/or base metal and the reason for the repair.</p> <p>Subsequent inservice examination of the structural weld overlays will be in accordance with ASME Section XI, Appendix Q, Q-4300.</p>	<p>11/07/2006 (Unit 1) 05/07/2007 (Unit 2)</p>	<p>05-15744-43 05-15744-45</p>

1. The recording criteria of the ultrasonic examination procedure to be used for the examination weld overlays (PDI-UT-8, Revision F) require that all indications, regardless of amplitude, be investigated to the extent necessary to provide accurate characterization, identity, and location. Additionally the procedure requires that all indications, regardless of amplitude, that cannot be clearly attributed to the geometry of the overlay configuration be considered flaw indications.
2. Ultrasonic examination procedure PDI-UT-8, Revision F, requires that all suspected flaw indications be plotted on a cross-sectional drawing of the weld and that the plots should accurately identify the specific origin of the reflector.