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

January 22, 2007
NOC-AE-06002100
File No.: G25
10CFR50.55a

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 Nos. STN 50-498, STN 50-499
Revised Application to Use ASME OM Code 2001 Edition with
2003 Addenda for Condition Monitoring of Check Valves

Reference: Letter from David W. Rencurrel, STP Nuclear Operating Company, to NRC Document Control Desk, "Application to Use ASME OM Code 2001 Edition with 2003 Addenda for Condition Monitoring of Check Valves," dated December 13, 2006 (NOC-AE-06002086)

Pursuant to 10 CFR 50.55a(f)(4)(iv), STP Nuclear Operating Company (STPNOC) requests permission to use a more recent edition of Section ISTC of the ASME Code in monitoring check valves at the South Texas Project, Units 1 and 2. ASME OM Code 2001 Edition with 2003 Addenda Appendix II, *Check Valve Condition Monitoring Program*, describes the condition monitoring approach to be implemented at the South Texas Project following NRC approval. The condition monitoring approach will be applied to all of the check valves presently in the scope of the inservice testing program.

The current code of record for the South Texas Project is the 1987 Edition of the Code for Operation and Maintenance of Nuclear Power Plants through the 1988 Addenda. As an alternative to the testing and examination requirements of section 4.3.2 for check valves in the current code of record, STPNOC intends to use the testing and examination requirements for check valves in Section ISTC of the 2001 Edition with 2003 Addenda of the OM Code, Appendix II, which allows the licensee to establish a check valve condition monitoring program. The purpose of the Condition Monitoring program is both to improve check valve performance and to optimize testing, examination, and preventive maintenance activities in order to maintain continued acceptable check valve performance. The attached application provides details justifying approval for use of the 2001 Edition with 2003 Addenda of the OM Code.

The attached application is revised from that provided in the referenced correspondence. Revised sections are indicated by bars in the margin.

STPNOC requests NRC approval by March 1, 2007. The implementation period will extend to December 31, 2008.

Commitments are provided as an attachment.

STI: 32103971

A047

If there are any questions, please contact either Philip Walker at (361) 972-8392 or me at (361) 972-8757.

J. J. Sheppard
President and Chief
Executive Officer

PLW
Attachments: 1) Revised Application to Use ASME OM Code 2001 Edition with 2003 Addenda for Condition Monitoring of Check Valves

2) List of Commitments

cc:

(paper copy)

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SOUTH TEXAS PROJECT
UNITS 1 & 2
REVISED APPLICATION TO USE ASME OM CODE 2001 EDITION WITH 2003 ADDENDA FOR CONDITION MONITORING OF CHECK VALVES

1. ASME CODE COMPONENTS AFFECTED

The condition monitoring approach will be applied to the check valves presently in the scope of the inservice testing (IST) program.

2. APPLICABLE CODE EDITION AND ADDENDA

The current code of record for the South Texas Project is the 1987 Edition of the Code for Operation and Maintenance of Nuclear Power Plants through the 1988 Addenda. Section 4.3.2 identifies check valve testing under the current code of record.

3. PROPOSED SUBSEQUENT CODE EDITION AND ADDENDA

Pursuant to 10 CFR 50.55a(f)(4)(iv), STP Nuclear Operating Company (STPNOC) requests permission to use Section ISTC of the 2001 Edition with 2003 Addenda of the ASME Code in monitoring check valves at the South Texas Project, Units 1 and 2.

ASME OM Code 2001 Edition with 2003 Addenda Appendix II, *Check Valve Condition Monitoring Program*, describes the condition monitoring approach to be applied.

4. RELATED REQUIREMENTS

There are no other requirements affected by this proposed change.

The NRC approved use of Appendix II check valve condition monitoring program requirements specified in the 2001 Edition with 2003 Addenda with no limitations or modifications (Federal Register 69 FR 58814). The Federal Register states in part:

> The modification in (b)(3)(iv) does not apply to the 2003 Addenda of the ASME OM Code because the earlier Code provisions on which this regulation was based were revised in the 2003 Addenda of the ASME OM Code to address the underlying issues which led to the NRC to impose the modification. The check valve monitoring program requirements in Appendix II of the 2003 Addenda of the ASME OM Code are equivalent to the check valve monitoring requirements in 10 CFR 50.55a(b)(3)(iv).

Unlike earlier editions and addenda of the OM Code, the 2003 Addenda of the 2001 Edition contains the modifications imposed by the NRC for those earlier editions and addenda. Included in these requirements is bi-directional testing of check valves. By adopting this edition and addenda of the OM Code, STPNOC will comply with these requirements.

6. IMPLEMENTATION OF UPDATED REQUIREMENTS

STPNOC will begin implementing the condition monitoring program following NRC approval of this request.

STPNOC has identified 26 check valves in Unit 1 that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, six are scheduled to be tested during outages. STPNOC will begin incorporating these six check valves into the Appendix II condition monitoring program upon approval of this request. These valves will meet the Appendix II or ISTC requirements for bi-directional testing by completion of the Unit 1 Spring 2008 refueling outage.

STPNOC has identified 22 check valves in Unit 2 that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, two are scheduled to be

tested during outages. These valves will meet the Appendix II or ISTC requirements for bi-directional testing by completion of the Fall 2008 refueling outage.

The remaining 20 check valves in each unit that are uni-directionally tested are currently tested on-line. These valves will meet the Appendix II or ISTC requirements for bi-directional testing by March 2008 for Unit 1 and October 2008 for Unit 2 except as follows:

> STPNOC will make a good-faith effort to meet the requirements for bi-directional testing by March 2008 for Unit 1 and October 2008 for Unit 2. If STPNOC determines that bi-directional testing is only possible during an outage, STPNOC will perform such testing during the Spring 2008 and Fall 2008 refueling outages (Units 1 and 2, respectively).

Class 1, 2, and 3 check valves currently required to be bi-directionally tested in accordance with the IST plan will continue to be bi-directionally tested. STPNOC will apply the requirements of Subsection ISTC to these valves by December 31, 2008.

If the condition monitoring program for a valve or valve group is discontinued, the testing or examination requirements of the 2001 Edition of the Code with 2003 Addenda, Section ISTC, will be applied to those affected check valves.

LIST OF COMMITMENTS

The following table identifies the actions in this document to which the STP Nuclear Operating Company 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	CR Action
STPNOC has identified 26 check valves in Unit 1 that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, six are scheduled to be tested during outages. STPNOC will begin incorporating these six check valves into the Appendix II condition monitoring program upon approval of this request. These valves will meet the Appendix II or ISTC requirements for bi-directional testing by completion of the Unit 1 Spring 2008 refueling outage.	04/01/2008	06-16412-7
STPNOC has identified 22 check valves in Unit 2 that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, two are scheduled to be tested during outages. These valves will meet the Appendix II or ISTC requirements for bi-directional testing by completion of the Unit 2 Fall 2008 refueling outage.	11/01/2008	06-16412-8
The remaining 20 check valves in each unit that are uni-directionally tested are currently tested on-line. These valves will meet the Appendix II or ISTC requirements for bi-directional testing by March 2008 for Unit 1 and October 2008 for Unit 2 except as follows: STPNOC will make a good-faith effort to meet the requirements for bi-directional testing by March 2008 for Unit 1 and October 2008 for Unit 2. If STPNOC determines that bi-directional testing is only possible during an outage, STPNOC will perform such testing during the Spring 2008 and Fall 2008 refueling outages (Units 1 and 2, respectively).	03/01/2008 10/01/2008	06-16412-9 06-16412-10
Class 1, 2, and 3 check valves currently required to be bi-directionally tested in accordance with the IST plan will continue to be bi-directionally tested.	On-going	06-16412-11
STPNOC will apply the requirements of Subsection ISTC to these valves by December 31, 2008.	12/31/2008	06-16412-6
If the condition monitoring program for a valve or valve group is discontinued, the testing or examination requirements of the 2001 Edition of the Code with 2003 Addenda, Section ISTC, will be applied to those affected check valves.	On-going	06-16412-12