



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

November 28, 2007  
NOC-AE-07002239  
10CFR50

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  
Correction of Statements made in Relief Request RR-ENG-2-15

- References:
1. Letter dated October 7, 1999, from J. J. Sheppard, STPNOC, to NRC Document Control Desk, "Request for Relief from ASME Boiler and Pressure Vessel Code Section XI Requirements (Relief Request RR-ENG-2-15)" [NOC-AE-000625]
  2. Letter dated July 17, 2000, from T. J. Jordan, STPNOC, to NRC Document Control Desk, "Supplement to Request for Relief from ASME Boiler and Pressure Vessel Code Section XI Requirements of IWA-5242(a) (RR-ENG-2-15)" [NOC-AE-00000884, ML003735206]
  3. Letter dated January 31, 2001, from Robert A. Gramm, NRC, to William T. Cottle, STPNOC, "South Texas Project, Units 1 and 2 - Request for Relief (RR-ENG-2-15) from ASME Code, Section XI Requirements (TAC Nos. MA6850 and MA6851)" [ST-AE-NOC-00000765, ML010310285]

STP Nuclear Operating Company (STPNOC) is submitting this letter to correct certain statements made in connection with Relief Request RR-ENG-2-15 (Reference 1 and Reference 2). The relief request was approved by Reference 3. STPNOC recently identified that References 1 and 2 contain incorrect statements. The purpose of this letter is to correct this information in the STP docket.

In Reference 1, STPNOC stated that:

Review of the material type and chromium content of bolted connections at the South Texas Project determined that bolting materials used in borated system applications that are insulated have a chromium content of at least 10%.

In Reference 2, STPNOC stated that:

Bolts in applications at the South Texas Project that could come in contact with borated water contain at least 12% chromium, which exceeds the 10% chromium content required under code case N-616.

The statements above indicate that all the bolted connections in these systems are eligible for the requested relief, which is not correct. During a recent station assessment, STPNOC identified that there are bolted connections in various components that have less than 10% chromium content (e.g., residual heat removal heat (RHR) exchanger flanges, pressurizer manway bolting, steam generator primary side manway bolting, reactor pressure vessel studs, letdown heat exchanger flanges). In addition, some bolted

connections have SA-194 Gr. 6 nuts, which have an allowable chromium content of 11.5% to 13.5% (acceptable per Code Case N-616, but possibly less than 12% noted in Reference 2).

Since the NRC's approval of STPNOC's relief request was limited to bolting materials that had greater than 10% chromium content, correction of these statements does not affect the current licensing basis for STP Units 1 & 2.

For the bolted connections where STPNOC incorrectly applied the relief request, STPNOC has taken the action required by the Technical Specifications and the STP corrective action program for a missed surveillance requirement. The missed surveillance has been successfully performed for the RHR and pressurizer manway connections. Evaluations have been performed for the components where inspection is not practical with the plant at power and STPNOC has determined it is acceptable to defer the surveillance until the next refueling outage (spring 2008 for Unit 1 and fall 2008 for Unit 2), in accordance with the provisions of the Technical Specifications. STPNOC has identified no safety significant issues associated with the missed surveillance from the improper application of the relief request.

The incorrect statements were made about eight years ago. STPNOC's review has determined the most likely cause is that the individuals performing the document review for the relief request overlooked the connections to components such as heat exchangers. STPNOC reviewed other relief requests submitted in that time frame and found no others with similar errors.

Please contact Mr. A. W. Harrison at (361) 972-7298, or me at (361) 972-7867 if you have any questions.

There are no commitments in this letter.



David W. Rencurrel  
Vice President,  
Engineering & Strategic Projects

Awh/

cc:  
(paper copy)

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

Mohan C. Thadani  
Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North (MS 7 D1)  
11555 Rockville Pike  
Rockville, MD 20852

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

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

(electronic copy)

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

Mohan C. Thadani  
U. S. Nuclear Regulatory Commission

Thad Hill  
Eddy Daniels  
Marty Ryan  
Harry Holloway  
Steve Winn  
NRG South Texas LP

Ed Alarcon  
J. J. Nesrsta  
R. K. Temple  
Kevin Pollo  
City Public Service

Jon C. Wood  
Cox Smith Matthews

C. Kirksey  
City of Austin