



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 7, 2012

LICENSEE: STP Nuclear Operating Company

FACILITY: South Texas Project, Units 1 and 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JULY 3, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND STP NUCLEAR OPERATING COMPANY, CONCERNING DEBRIS FROM COATING FAILURES - FOLLOWUP, PERTAINING TO THE SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (TAC NOS. ME4936 AND ME4937)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held a telephone conference call on July 3, 2012, to discuss staff aging management concerns related to debris from coating failures affecting downstream components, in the South Texas Project, Units 1 and 2 license renewal application (LRA). The telephone conference call was useful in clarifying staff concerns on the issue.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a summary of the discussion.

The applicant had an opportunity to comment on this summary.

A handwritten signature in black ink that reads "John Daily".

John Daily, Sr. Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:
As stated

cc w/encls: Listserv

TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
July 3, 2012

PARTICIPANTS	AFFILIATIONS
John Daily	U.S. Nuclear Regulatory Commission (NRC)
James Gavula	NRC
Arden Aldridge	STP Nuclear Operating Company (STPNOC)
Ken Taplett	STPNOC
Randall Williams	STPNOC
Cong Pham	STPNOC
Tammy Jacobs	STPNOC
Gary Warner	STARS Worley Parsons Center of Business

REQUEST FOR ADDITIONAL INFORMATION
SOUTH TEXAS PROJECT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
DEBRIS FROM COATING FAILURES - FOLLOWUP
RAI B2.1.9-3c

July 3, 2012

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RAI B2.1.9-3c discussion

The staff provided its concerns on this issue and discussed them with the applicant. The concerns are what led to issuance of the follow-up RAI.

- The inspection frequency of the coatings should consider the service life of the installed coating as well as the trending of ongoing coating inspections. As the end of service life approaches, past performance of the coating may not accurately predict the coating's future behavior. Recent industry operating experience reviews indicate that coating failures have been caused by operation of the coatings beyond their qualified service life without appropriate justification. In that regard, the service life, as described in EPRI 1019157, "Guideline on Safety-Related Coatings," should initially be identified from the process that installed the coating, and if, during the period of extended operation, the coatings will be operated beyond the qualified service life, then an appropriate justification should be provided. The applicant's response refers to the coatings as "permanent coatings," therefore the applicant should document what that expected life is (e.g., whether for 10 years, 20 years, the remaining life of the unit, etc.). Furthermore, if the coatings in question have a finite life (otherwise known as a service life), how is that accounted for as operation approaches or exceeds the service life during the period of extended operation?
- Although visual examination of coatings can identify degradation indicative of delamination, EPRI 1019157 states that "lightly tapping the exposed coating may indicate disbonding that may not be evident with visual inspection [e.g., by a change in resulting sound from the tap]." In addition, with regard to adhesion testing, ASTM D4541, "Test Method for Pull-Off Strength of Coatings Using Portable Adhesion Testers" (as discussed in EPRI 1019157), indicates that the testing determines **either** the force that a surface area can bear before a plug of material is detached **or** whether the surface remains intact at a prescribed force. As such, adhesion testing would not necessarily result in the destruction of the coating as stated in the applicant's response. The vendor's application data sheets apparently do not specify the use of a physical-mechanical, contact type of test for verifying adhesion, thus how the applicant would verify adhesion degradation before failure is not evident.

- For visual inspections of coatings performed through this kind of program, EPRI 1019157 states that Coatings Surveillance Personnel should meet applicable plant licensing commitments and be approved by the utility Nuclear Coating Specialist. The qualification recommendations of a Nuclear Coating Specialist are defined in ASTM D7108, "Standard Practice for Establishing Qualifications for a Nuclear Coating Specialist."

The applicant agreed that it would take the staff's concerns into account as it prepares its response to the RAI. Both the staff and the applicant agreed that the discussion was useful in clarifying the RAI.

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/RA/

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OFFICIAL RECORD COPY

Memorandum to STP Nuclear Operating Company from J. Daily dated August 7, 2012

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