



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

May 27, 2015

Mr. G. T. Powell, Vice President  
Technical Support and Oversight  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
SOUTH TEXAS PROJECT, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION – SET 30 (TAC NOS. ME4936 AND ME4937)

Dear Mr. Powell:

By letter dated October 25, 2010, STP Nuclear Operating Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew operating licenses NPF-76 and NPF-80 for South Texas Project, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC) staff. The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

This request for additional information has been presented to Mr. Arden Aldridge of your staff, and we request your response within 30 days of the date of this letter. If you have any questions, please contact me by telephone at 301-415-3873 or by e-mail at [john.daily@nrc.gov](mailto:john.daily@nrc.gov).

Sincerely,

**/RA/**

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

Docket Nos. 50-498 and 50-499

Enclosure:  
As stated

cc : Listserv

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\*concurrence via email

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SOUTH TEXAS PROJECT, UNITS 1 AND 2  
REQUEST FOR ADDITIONAL INFORMATION - SET 30  
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RAI 3.0.3-2a, LR-ISG-2013-01 Follow-up

Background

The staff reviewed the response to RAI 3.0.3-2 (loss of coating integrity), dated June 3, 2014, as it relates to LR-ISG-2013-01, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks," and needs clarification on some parts of the response. Specifically, the response states the following:

- a. Inspection intervals: visual inspections are conducted every 6 years, testing is conducted every 6 years after 12 years of service, and the EW pumps are inspected at a nominal frequency of every 10 years. [The staff notes that the acronym "EW" is not defined in the LRA or RAI response; since it is used as a system acronym for the essential cooling water system in the drawings submitted by the applicant (e.g., LR-STP-EW-5R289F05038#1-1 in LRA Section 2.3.3.4), the staff understands this to refer to that system]
- b. The Nuclear Coatings Specialist is qualified in accordance with ASTM D7108.
- c. Coatings are inspected for blistering, cracking, peeling, delamination physical damage and erosion.
- d. The acceptance criterion is the absence of indications of erosion, corrosion, cavitation erosion, flaking or peeling of the coatings is observed. Coatings that do not meet acceptance criteria are considered degraded and a condition report is initiated to document and resolve the concern. Coatings that do not meet acceptance criteria are repaired "as needed."

LR-ISG-2013-01 was issued on November 14, 2014.

Issue

- a. LR-ISG-2013-01 recommends a baseline inspection in the 10-year period prior to the period of extended operation. In addition, it recommends that inspections be conducted every 4 years if degraded coatings are detected during prior inspections. The response did not state the basis for conducting inspections every 6 years regardless of the results of prior inspections or the basis for inspecting the EW pumps every 10 years.
- b. LR-ISG-2013-01 recommends that inspection personnel be qualified in accordance with ASTM standards endorsed in Regulatory Guide 1.54. The response does not state the minimum qualification requirements of inspectors working under the direction of a Nuclear Coatings Specialist.
- c. The response does not provide a basis for not inspecting for flaking and rusting.
- d. LR-ISG-2013-01 recommends that indications of peeling and delamination are not acceptable. It also recommends that the other indications of degradation be evaluated by a Nuclear Coatings Specialist.

ENCLOSURE

It further recommends that coatings that do not meet acceptance criteria are repaired, replaced, or removed. Based on the RAI response statements that: (a) indications of erosion, corrosion, cavitation erosion, flaking or peeling are not acceptable; (b) coatings that do not meet acceptance criteria are documented with a condition report; and (c) coatings that do not meet acceptance criteria are repaired "as needed," it is unclear to the staff what conditions of degraded coatings will result in repair, replacement, or removal.

Request

- a. State the basis for not conducting a baseline inspection in the 10-year period prior to the period of extended operation and for the subsequent 6-year and 10-year inspection intervals.
- b. State the minimum qualification requirements for inspectors working under the direction of a Nuclear Coatings Specialist.
- c. State the basis for not inspecting for flaking and rusting.
- d. State what indications of coating degradation will be found unacceptable and those that will be evaluated by a Nuclear Coatings Specialist for acceptability. State what indications of coating degradation will be repaired, replaced, or removed prior to returning a component to service.

Please include any appropriate changes to the applicable aging management programs and UFSAR Supplement based upon the responses to the above requests.

Letter to G. Powell from J. Daily dated May 27, 2015

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