

The Light company

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March 13, 1981
ST-HL-AE-637
SFN: V-0110

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IE FILES

Mr. Karl Seyfrit
Director, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive
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Arlington, Texas 76012



References: (a) HL&P letter ST-HL-AE-575 dated November 19, 1980
(b) NRC Region IV letter dated November 21, 1980
(c) HL&P letter ST-HL-AE-590 dated December 17, 1980
(d) NRC Region IV letter dated January 5, 1981

Dear Mr. Seyfrit:

South Texas Project
Units 1&2
Docket Nos. STN 50-498, STN 50-499
Resumption of Safety-Related ASME Welding

In accordance with References (a) and (b), ASME safety-related production welding was restarted on a limited basis on November 24, 1980. The welding work was expanded on January 5, 1981, in accordance with a ten-week work plan submitted to the NRC and authorized via References (c) and (d), respectively.

The ASME safety-related welding performed to date has verified that the corrective actions committed to in our response to the NRC Order to Show Cause are adequate and are being satisfactorily implemented. Specifically, the ASME welding activities performed to date have verified that:

1. Management systems and special procedures established to control ASME safety-related welding are adequate and are being satisfactorily implemented.
2. Training of personnel is adequate.
3. Staffing required to both perform and manage the work is adequate.

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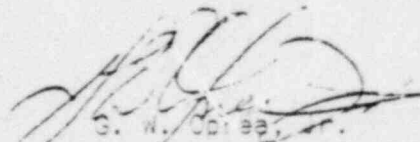
Mr. Karl Seyfnit
ST-HL-AE-637
March 13, 1981
Page 2

The adequacy of the corrective actions is reflected by the following:

1. The repair rate of ASME Class 3 pipe welds (other than ECW) performed since January 5, 1981, has been maintained at about 2%.
2. The reject rate of radiographed ASME Class 2 pipe welds performed since January 5, 1981, is 0%.
3. The reject rate of radiographed butt welds in Aluminum-Bronze ECW piping is about 22%. This represents a significant reduction in the weld repair rate on this system.
4. The reports issued by the independent third-party inspector surveying the welding restart activities indicate that the personnel, procedures, training, and controls associated with ASME safety-related welding are adequate and are being properly implemented.
5. Results of our quality assurance inspections of ASME welding performed to date have shown that quality requirements have been met. Our understanding of recent NRC inspection results confirms that no items of noncompliance or deviations have been identified.

We will be ready to resume ASME safety-related welding on a regular production basis on March 16, 1981, and to integrate future ASME welding into the normal project construction schedule. Please advise if you have any questions concerning this plan.

Very truly yours,



G. W. O'Brien
Executive Vice President

Houston Lighting & Power Company

March 13, 1981

cc: J. H. Goldberg

ST-HL-AE-637

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SFN: V-0110

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Page 3

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