

# The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

June 20, 1989  
ST-HL-AE-3093  
File No.: T3.1  
10CFR50

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project Electric Generating Station  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Request for Approval of ASME Code Case N-460

Reference: 1. Telephone Conference Call, April 20, 1989  
G. Dick (NRC), G. Johnson (NRC),  
B. Brown (EG&G-Idaho), and R. Beverly (HL&P)

As discussed in the above reference on April 20, 1989, this letter is a specific request to the NRC for approval to apply ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds" during Inservice Inspections for the first 10-year inspection interval at STPEGS. Code Case N-460 addresses which alternative rule may be used for Section XI, Division 1, examination of Class 1 welds (IWB-2500) or Class 2 welds (IWC-2500) when the entire examination volume or area cannot be examined due to interference by another component or part geometry and states that "a reduction in examination coverage on any Class 1 or Class 2 weld may be accepted provided the reduction in coverage for that weld is less than 10%." Therefore Code Case N-460 provides generic approval of less than 10% reduction in coverage of examination volume or area due to interference by another component or part geometry. It is our understanding that although Code Case N-460 has not yet been approved by the NRC in Regulatory Guide 1.147, the NRC has approved the use of Code Case N-460 by specific request. It is the opinion of HL&P that the implementation of Code Case N-460 will reduce the number of examination areas included in a Relief Request for examination limitations, and the use of Code Case N-460 does not compromise the acceptable level of quality or safety. The applicable STP examination records shall identify both the cause and percentage of reduced examination coverage. Therefore, in accordance with Code Case N-460, only those limitations which are considered significant (10% or greater) will be documented in a Relief Request and submitted for NRC review and approval.

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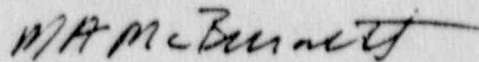
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If you should have any questions on this matter, please contact  
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