COMPARY Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

October 15, 1982 ST-HL-AE-893 File Number: G12.84 SFN: V-0530

Mr. John T. Collins Regional Administrator, Region IV Nuclear Regulatory Commission 611 Ryan Plaza Dr., Suite 1000 Arlington, Texas 76012

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Dear Mr. Collins:

**The Light** 

South Texas Project Units 1 & 2 Docket Nos. STN 50-498, STN 50-499 Fifth Interim Report Concerning Vendor Fabricated Structural Steel

On January 8, 1981, pursuant to 10CFR50.55(e), Houston Lighting & Power Company (HL&P) notified your office of an item concerning nonconformances of welds in vendor fabricated Category I structural steel. These welds were performed at the fabricator's facility and were not associated with the on-site welding program.

In our fourth interim report, submitted to your office by letter dated March 30, 1982, we identified that Bechtel would review the previous program and results and provide their recommendations prior to closure of this item.

Bechtel has initiated a program to review and evaluate the previously generated Nonconformance Reports (NCR's) associated with this item. These NCR's were initiated as a result of Brown & Root's (B&R's) field reinspection program for American Bridge structural steel. The evaluations performed by Bechtel will be based upon the B&R reinspection results. The evaluation of the NCR's is being utilized by Bechtel to develop a data base for a statistical analysis which is to be used to postulate whether statistically significant strength related welding deficiencies (i.e., undercut and undersize) exist in welds that were not examined or are now inaccessible. The final evaluation and disposition of such postulated and existing strength related defects is to be based on the project's revised acceptance criteria for inspection of AWS field welds. This criteria for inspection of AWS field welds will be provided in a future FSAR Amendment. Where acceptance criteria are exceeded an analysis to assess structural integrity will be performed.

Structurally less significant nonconformances such as convexity, arc strikes, and weld spatter are being dispositioned by Bechtel on the basis of a review performed by a consultant. The consultant (Battelle Columbus Laboratories), as part of their evaluation of similar nonconformances identified in the review of the B&R safety-related field welding program, has

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concluded that convexity, arc strikes and weld spatter in ASTM A36 steel have only localized effects, inconsequential to the structural integrity of the weldment.

Bechtel also concluded that ASTM A36 steel in typical welded connections is fracture safe at the minimum service temperatures that prevail at the South Texas Project.

Prior to any further shipment of Category I structural steel components by American Bridge, Bechtel will assure that a surveillance inspection on 100% of all welded material was or will be performed consistent with the specification. These actions will serve to prevent a recurrence of nonconforming weld conditions.

To date no safety hazard has been identified relative to these nonconforming weld conditions.

The next report concerning this item will be submitted to your office by May 9, 1983.

If you should have any questions concerning this matter, please contact Mr. Michael E. Powell at (713) 877-3281.

Very truly yours,

G. W. Oprea, Jr. Executive Vice President

MEP/mg

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October 15, 1982 cc: G. W. Oprea, Jr. J. H. Goldberg ST-HL-AE-893 File Number: G12.84 J. G. Dewease J. D. Parsons Page 3 D. G. Barker C. G. Robertson R. A. Frazar J. W. Williams R. J. Maroni J. E. Geiger H. A. Walker S. M. Dew J. T. Collins (NRC) D. E. Sells (NRC) W. M. Hill, Jr. (NRC) M. D. Schwarz (Baker & Botts) R. Gordon Gooch (Baker & Botts) J. R. Newman (Lowenstein, Newman, Reis, & Axelrad) STP RMS Director, Office of Inspection & Enforcement Nuclear Regulatory Commission Washington, D. C. 20555 G. W. Muench/R. L. Range Charles Bechhoefer, Esquire Central Power & Light Company Chairman, Atomic Safety & Licensing Board P. O. Box 2121 U. S. Nuclear Regulatory Commission Corpus Christi, Texas 78403 Washington, D. C. 20555 H. L. Peterson/G. Pokorny Dr. James C. Lamb, III City of Austin 313 Woodhaven Road P. O. Box 1088 Chapel Hill, North Carolina 27514 Austin, Texas 78767 J. B. Poston/A. vonRosenberg Mr. Ernest E. Hill City Public Service Board Lawrence Livermore Laboratory P. O. Box 1771 University of California San Antonio, Texas 78296 P. O. Box 808, L-46 Livermore, California 94550 Brian E. Berwick, Esquire William S. Jordan, III Assistant Attorney General Harmon & Weiss for the State of Texas 1725 I Street, N. W. P. O. Box 12548 Suite 506 Capitol Station Washington, D. C. 20006 Austin, Texas 78711 Lanny Sinkin Citizens for Equitable Utilities, Inc. Citizens Concerned About Nuclear Power c/o Ms. Peggy Buchorn 5100 Casa Oro Route 1, Box 1684 San Antonio, Texas 78233 Brazoria, Texas 77422 Jay Gutierrez, Esquire Hearing Attorney

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