

The Light company

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

October 23, 1995
ST-HL-AE-5219
File No.: G03.08
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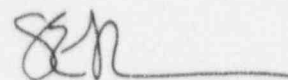
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Additional Information Regarding NRC Generic Letter 95-03:
"Circumferential Cracking of Steam Generator Tubes"

Reference: Correspondence from T. W. Alexion, Nuclear Regulatory Commission
to W. T. Cottle, South Texas Project dated September 26, 1995
(ST-AE-HL-94316)

Pursuant to the referenced correspondence, the attachment provides additional
information and clarification regarding South Texas Project's response on June 27, 1995 to
NRC Generic Letter 95-03.

If there are any questions regarding this request, please contact Mr. A. C. McIntyre at
(512) 972-8597 or me at (512) 972-7162.



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KJT/lf

Attachment: Additional Information Regarding NRC Generic Letter 95-03

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Project Manager on Behalf of the Participants in the South Texas Project

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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**ADDITIONAL INFORMATION REGARDING
NRC GENERIC LETTER 95-03**

**SOUTH TEXAS PROJECT
UNITS 1 AND 2**

- References:
- A. Letter from T. H. Cloninger to NRC Document Control Desk dated June 27, 1995 (ST-HL-AE-5111)
 - B. Letter from T. H. Cloninger to NRC Document Control Desk dated October 2, 1995 (ST-HL-AE-5190)

South Texas Project responded to NRC Generic Letter 95-03, "Circumferential Cracking of Steam Generator Tubes", on June 27, 1995. This attachment provides additional information and clarification regarding that response.

Additional Information Requested by the NRC:

During the Maine Yankee outage in July/August 1994, several weaknesses were identified in their eddy current program as detailed in NRC Information Notice (IN) 94-88, "Inservice Inspection Deficiencies Result in Severely Degraded Steam Generator Tubes". In IN 94-88, the staff observed that several circumferential indications could be traced back to earlier inspections when the data was reanalyzed using terrain plots. These terrain plots had not been generated as part of the original field analysis for these tubes. For the rotating pancake coil (RPC) examinations performed at your plant at locations susceptible to circumferential cracking during the previous inspection (i.e., previous inspection per your GL 95-03 response), discuss the extent to which terrain plots were used to analyze the eddy current data. If terrain plots were not routinely used at locations susceptible to circumferential cracking, discuss whether or not the RPC eddy current data has been reanalyzed using terrain mapping of the data. If terrain plots were not routinely used during the outage and your data has not been reanalyzed with terrain mapping of the data, discuss your basis for not reanalyzing your previous RPC data in light of the findings at Maine Yankee.

Discuss whether terrain plots will be used to analyze the RPC eddy current data at locations susceptible to circumferential cracking during your next steam generator tube inspection (i.e., the next inspection per your GL 95-03 response).

South Texas Project Response:

The scope and results of inspections performed on steam generator tubes in past inspections for South Texas Project Units 1 and 2 were described in our response to Generic Letter 95-03 dated June 27, 1995 (Reference A). Additional areas inspected for circumferential cracking were described in our response (Reference B) to your request for additional information dated September 8, 1995. In all of these inspections described in References A and B, terrain plots were employed at the time of those inspections for analysis purposes.

At the time of the 1993 inspections of Unit 1 & 2 steam generators, the South Texas Project eddy current data analysis guidelines did not address review of the terrain plots for rotating pancake coil (RPC) data. However, the vendor (BW Nuclear Technology) procedure, ISI-510, Revision 13 "RPC System Operating Procedure", required that terrain plots be reviewed to locate any potential defects. It has been confirmed that, in 1993, the vendor routinely used terrain plots during the analysis of such data.

In December 1994, the NRC Information Notice 94-88 entitled "Inservice Inspection Deficiencies Result in Severely Degraded Steam Generator Tubes" was issued. It notified the industry of the value of reviewing terrain plots in screening data for the detection of circumferential cracks at the Maine Yankee plant.

The RPC portion of the 1995 Unit 1 & 2 steam generator inspections also employed the use of terrain plots for analysis. The South Texas Project guideline applicable to both units in their respective 1995 inspections has been upgraded to require terrain plots viewed for the entire length of the tube examined.