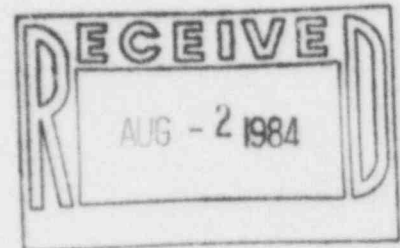


The Light company

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

July 30, 1984
ST-HL-AE-1110
File No: G12.13/C10.11/C10.9

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



Dear Mr. Collins:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Material Control Program and
User Test Program Clarifications

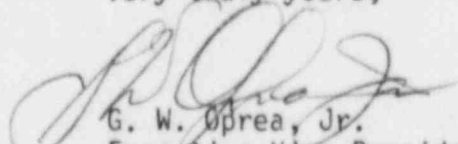
On February 21, 1984, Houston Lighting and Power Company (HL&P) submitted the response to Notice of Violation 8322-02 contained in Inspection Report 83-22 (ST-HL-AE-1060). In that response HL&P described improvements being made to the material control program for the South Texas Project (STP) and gave an outline of a user test program being instituted at the STP.

In the implementation of the material control program improvements it became necessary to make certain refinements and changes to the specific features described in our February 21, 1984 letter. These changes have been discussed with the NRC Site Resident Inspector and are detailed in the attachment to this letter.

As previously discussed with your staff we believe the material control program currently in effect at the STP provides adequate control of safety-related materials. As such, the features of this current program supercede previous commitments made regarding material control provisions, specifically those made in our December 31, 1979 Third Interim Report Concerning Improper Anchor Bolt Material (ST-HL-AE-400). Should the need arise to significantly alter the present material control program HL&P will discuss any such changes with the Site Resident Inspector and, if necessary, with your office directly.

If you should have any questions concerning this matter, please contact Mr. Michael E. Powell at (713) 993-1328.

Very truly yours,


G. W. Oprea, Jr.
Executive Vice President

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LJK/mg
Attachment: STP Material Control Program and
User Test Program Clarification

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Houston Lighting & Power Company

July 30, 1984
ST-HL-AE-1110
File No: G12.13/C10.11/
C10.9

Page 2

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Revised 04/03/84

South Texas Project
Units 1 & 2
Material Control Program And
User Test Program Clarification

1.) Feature Described in February 21, 1984 Letter

Reinstitute the transfer of heat code identifiers on non-ASME safety-related high strength miscellaneous structural shapes and materials when this material is cut during site fabrication. (For ASME material this is already being done).

Clarification/Change

None.

2.) Feature Described in February 21, 1984 Letter

Undertake user testing on non-ASME safety-related A36 bulk shapes and plate. Samples of each heat received from each vendor will be tested. This material will then be hard marked (stamped) to indicate that it is A36. The hard marks will be transferred during site fabrication activities.

Clarification/Change

In the event that A36 or A500 Grade B tube steel is not uniquely identifiable to an individual heat number, then testing will be performed on a periodic basis until the lot is depleted. The frequency of testing will be established on a case basis.

3.) Feature Described in February 21, 1984 Letter

Undertake user testing for hardness and tensile strength on samples, by shipment, of bulk safety-related threaded fasteners. These fasteners will be stamped to indicate grade (type) and class consistent with ASME III size restrictions.

Clarification/Change

The sentence in our letter which stated in part that threaded fasteners "will be stamped to indicate grade (type) and class" was meant to describe an existing condition and not a new commitment. Currently we purchase fasteners which are marked per ASTM requirements. Additional marking requirements imposed by our material control program to preclude commingling of safety and non-safety class material include both hard marking and color coded zinc electroplating processes.

In addition, for fasteners in inventory prior to May 21, 1984, the test sample will be defined by warehouse bin rather than by shipment as indicated in our letter. This is due to the fact that shipment identity is not maintained during storage. For future receipts, testing will be by shipment.

4.) Feature Described in February 21, 1984 Letter

Undertake user testing for hardness and tensile strength on samples of safety-related anchor bolts by shipment. Anchor bolts will be stamped to indicate material type. Site fabrication of all anchor bolts (safety-related and non-safety-related) has been discontinued.

Clarification/Change

We have modified our testing program to eliminate laboratory hardness testing of A36 and A193 anchor bolts. ASTM does not define any hardness limits for A36 and A193 material, and therefore hardness test results would not be meaningful. Tensile tests are required for this material under our program and are sufficient per ASTM to verify material type.

In the event that long lead time anchor bolts do not exist in sufficient quantity to permit destructive testing per our program, we will undertake an alternate non-destructive testing program in the field to verify material type. This program will be fully documented by design specification and jobsite procedure. The program will employ the Equotip hardness tester correlated to known tensile strengths by material type and the Texas Nuclear Alloy Analyzer which is able to distinguish material types through spectographic analysis.