

# The Light company

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Mr. Harold R. Denton  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Replacement Parts for Code Components  
Where the Manufacturers Have Discontinued  
ASME Code Authorizations and N-Type Stamps

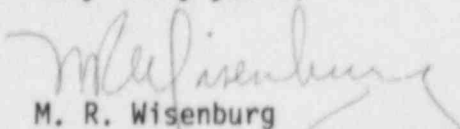
The South Texas Project (STP) is experiencing instances where original ASME Code Section III components were purchased N-stamped but the manufacturer has since discontinued his stamp and Code Authorization when spare parts need to be procured.

Such spare parts need to be procured from the original manufacturer for reasons of reliability in fit and function. Houston Lighting & Power Company (HL&P) intends to procure the spare parts, in these occasional cases, from the original manufacturer and to exercise control through the HL&P QA Program, under the ASME Code, Section XI. Attachment 1 describes the concern and the method of procurement.

The ASME Code, Section XI, Paragraph IWA-4130(c) states that the Repair Programs are subject to review by the NRC. This is a potentially generic situation in procurement of replacements that affects Repair Programs. The purpose of this letter is to notify the NRC of the STP position and how we are procuring spare parts when this situation occurs.

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

Very truly yours,

  
M. R. Wisenburg  
Manager, Nuclear Licensing

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Attachment

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1. Repairs and Replacements to ASME Code, Section III, Nuclear Power Plant Components are subject to the requirements of the ASME Code, Section XI, "In-service Inspection".
2. Article IWA-7000 of Section XI specifies the general requirements for replacements. Paragraph IWA-7210(b) provides that replacements ordered as spares shall meet the requirements of the Construction Code used, or those of a later edition.
3. In compliance with a conservative interpretation of the Code, HL&P procures replacements from ASME Certificate of Authorization holders. Repairs and replacements are conducted under HL&P's Quality Assurance Programs approved by the NRC and by the Authorized Inspection Agency. HL&P is not required by the Code to be a N-type Certificate Holder for the purpose of procurement or performance of repairs and replacements under the ASME Code, Section XI.
4. There are recent instances, however, where the manufacturers of original Code stamped components have elected to allow their ASME Certificate of Authorization to expire. A current example on the South Texas Project is the WKM Company that supplied Control valves for the Feedwater system.
5. Where HL&P procures a spare component (eg. a complete valve), measures are taken to procure it from an alternate manufacturer with current Code, Section III authorization. However, where a spare Code part, for example a disc, is required, it is considered desirable to procure it from the original manufacturer for reasons of reliability, fit and function.
6. In such cases, the technical requirements of the ASME Code, Section III will be specified and met, but the manufacturer may be neither an ASME Certificate holder nor will he apply an N-type stamp to welded spare parts. The quality of the spare part will be assured by specification of equivalent QA program requirements. The procurements are treated as safety-related. The vendor's QA Program is reviewed by HL&P against Regulatory and Code requirements for Quality Assurance.
7. Where the Code spare part for a component, such as a valve or a pump, is of the nature of "material, i.e., a non-welded part, and where the manufacturer no longer has an ASME Authorization, HL&P will either assure that the material is procured by the manufacturer from material manufacturers or suppliers with Code Quality System certificate or survey and audit them against the requirements for Code Quality Systems, paragraph NCA 3800 of the ASME Code, Section III.

8. Spare parts procured from the manufacturers who no longer have an ASME Certificate of Authorization will be subject to 100% inspection by HL&P.
9. These procurements are subject to monitoring by the Authorized Nuclear In-service Inspector.
10. Activities performed by HL&P under the ASME Code, Section XI, may be delegated to Bechtel Energy Corporation as agent of the Owner. This is provided for in the HL&P Quality Assurance Program.