



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 18, 1988

Docket

Docket No. 50-499

Mr. J. H. Goldberg
Group Vice-President, Nuclear
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77001

Dear Mr. Goldberg:

SUBJECT: AS-BUILT RECONCILIATION PROGRAM, SOUTH TEXAS PROJECT,
UNIT 2 (TAC NO. 67871)

In IE Bulletin No. 79-14, Revision 1 (July 18, 1979), the staff stated that "---where design specifications and drawings are used to obtain input information for seismic analysis of safety-related piping systems, that it is essential for those documents to reflect as-built configurations." As a result of the staff's concerns the bulletin directed that all licensees and applicants verify that the plant's seismic analysis applied to the actual configuration of safety-related piping systems.

In letters from Houston Lighting & Power (HL&P) dated January 5 and April 18, 1988, the plan for addressing the South Texas Project, Unit 2 (STP-2) IE Bulletin 79-14 requirements for conducting an as-built reconciliation (ABR) program was presented. The HL&P position was that the Unit 2 program would be limited to Class 1 piping only unless the program identified significant problems; then an evaluation will be performed and corrective action taken.

The staff, in evaluating HL&P's proposal, considered the results of the Unit 1 ABR which resulted in modifications to only three supports and the fact the same design and control program that was applied to Unit 1 was also implemented on Unit 2. In addition, the staff performed a limited audit during the week of June 20, 1988. No significant discrepancies or out-of-tolerance conditions were found. Based on the foregoing considerations the staff concludes that the IE Bulletin 79-14 requirement for conducting an as-built reconciliation of 100% the Class 2 and 3 piping may be relaxed.

The staff will permit the reconciliation to be done using a statistically determined sample. Based on a 95/95 confidence level, the acceptable sample size should consist of 55 stress calculations chosen on a random basis from the Class 2 and 3 population of 414 stress calculations. The Class 2 and 3 scope of stress calculations will be considered acceptable if no stress or load limits are exceeded and no physical modifications are found to be required in this sample. (Note that any piping reevaluations which might be necessary should be based on the same loading conditions and stress-and-load limits which formed the licensing basis of the original stress calculation.)

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If any stress or load limits are found to have been exceeded and modifications are found to be necessary, HL&P will be required to perform an ABR for all remaining Class 2 and 3 piping systems.

At the completion of the ABR program, HL&P is requested to provide a statistical evaluation of the results, which should contain as a minimum, the number of tolerance exceedances and their magnitude, and a comparison of as-built and as-designed piping stresses, support and nozzle loads where such items were required to be recalculated.

Sincerely,

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George F. Dick, Jr., Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects

cc: See next page

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George F. Dick, Jr.
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