



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

50-488/489

November 2, 1998

LICENSEE: STP Nuclear Operating Company  
FACILITY: South Texas Project, Units 1 and 2 (STP)  
SUBJECT: CONFERENCE CALL SUMMARY REGARDING LICENSEE'S QUESTIONS  
CONCERNING RISK-INFORMED INSERVICE INSPECTION AND/OR  
INSERVICE TESTING PROGRAMS

On October 8, 1998, the Nuclear Regulatory Commission (NRC) staff held a conference call with the licensee to discuss the course of action that would be anticipated if the licensee were to submit a risk-informed inservice inspection (RI-ISI) and/or a risk-informed inservice testing (RI-IST) program. Conference call participants are listed in Attachment 1. Questions faxed by the licensee for discussion during the conference call are in Attachment 2.

The NRC staff is currently reviewing several RI-ISI pilot applications and has recently completed its review of the RI-IST pilot application for the Comanche Peak Steam Electric Station. A risk-informed ISI or IST application submitted by future licensees would not be reviewed as a pilot application, and the staff expects that a more efficient review would ensue depending on several factors such as the quality of the probabilistic risk assessment (PRA) and the extent to which the submittals conform to the guidance in NRC's RI-ISI and RI-IST regulatory guides and Standard Review Plan.

The NRC staff discussed with the licensee the highlights of the October 8, 1998, meeting it had with the Nuclear Energy Institute (NEI) in which several options were discussed to expedite the review of future plant-specific RI-ISI submittals. Also discussed was the concept of an extension of a licensee's 120-month program update to facilitate integration of a risk-informed approach with a program update. At this time, the staff believes that the most expeditious path for review and approval of RI-ISI (and RI-IST) submittals would be for each licensee to submit a plant-specific risk-informed application as an alternative to the regulations pursuant to 10 CFR 50.55a(a)(3) until such time when a RI-ISI (or RI-IST) ASME Code case is issued and endorsed by the staff in Regulatory Guide (RG) 1.147. Authorization of the risk-informed process, that establishes the scope of welds to be examined and alternative examination methods, would be valid for the remaining life of the plant with plan updates in accordance with approved submittals. The staff expects that once the RI-ISI (or RI-IST) Code case is endorsed in RG 1.147, licensees may use the Code case without further review and approval by the staff of the risk-informed program. However, licensees would still be required to submit their 120-month (10-year) updated ISI and IST programs and requests for relief from impractical Code requirements. The 120-month updated ISI program would include the results of the RI-ISI program such as the scope of welds to be examined and examination methods to be used. Similarly, for RI-IST, the 120-month updated IST program would be expected to include the pumps and valves to be tested and the alternative frequency of the tests as established by the RI-IST process.

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The staff and licensee discussed several questions and concerns raised in anticipation of changing to a risk-informed ISI or IST program. One question raised by the licensee was whether it would be allowed to use the 1995 Edition of the ASME Boiler and Pressure Vessel Code (ASME Code) and/or the 1995 Edition of the Code for Operation and Maintenance of Nuclear Power Plants (OM Code) in lieu of the 1989 Edition as currently required by 10 CFR 50.55a. The staff noted that current rulemaking to amend 10 CFR 50.55a would incorporate by reference the 1995 Edition (and 1996 Addenda) to both the ASME and OM Code. The staff expects the rulemaking to be final in April 1999. Therefore, provided the licensee adheres to any limitations specified by the final rulemaking for these Codes, the staff believed it would be appropriate for the licensee to use the 1995 Edition (and 1996 Addenda) of the ASME and OM Code.

The licensee also raised a question whether the proposed two-year extension of the 120-month interval that the staff would allow for the licensee to pursue a RI-ISI (or RI-IST) program is in lieu of the existing one-year extension currently allowed by the Code or can the proposed two-year extension be appended to the one-year, Code-allowed extension (thus, allowing a three-year total extension)? Although the staff's initial understanding was that a two-year extension was in lieu of the existing one-year, Code-allowed extension, the staff stated that it may consider the possibility of a total three-year extension with appropriate basis. The licensee stated that, for their situation, a three-year extension would allow them to have the necessary resources available to develop a risk-informed program and revise the large number of affected plant procedures. However, the proposed information notice is likely to indicate a period of two years of extension.

The third concern raised by the licensee was whether an extension of the 10-year ISI interval would also be applicable to ISI examinations and tests other than those examinations covered by the RI-ISI program. Currently, the RI-ISI program only covers piping welds and nozzle-to-piping welds. It does not cover examination of vessel welds, piping supports, valve internals, bolting, system pressure tests and augmented inservice inspection commitments. The licensee noted that it would be a hardship to have two separate ISI programs (one for piping welds and one for other components). The staff stated that it would also consider the possibility of allowing the extension of the 10-year ISI interval to be applicable to all examinations and tests covered by the ISI program. The only exception noted by the staff would be examinations of the reactor vessel. However, the licensee notes that it would complete its examinations of the reactor vessel in accordance with the regulations and ASME Code requirements.

The staff made no commitments, and agreed with the licensee that further dialogue was appropriate. A follow-up conference call or meeting in about a month to update each other on the status of activities in the area of RI-ISI and RI-IST appeared reasonable. One possible scenario that was discussed is that the licensee may submit a relief request for a schedular

extension in the December/January time frame that provides the scope, schedule and approach of a combined risk-informed and program update activity, along with the basis. This would be followed about 6 months later with a submittal regarding the licensee's overall risk-informed program and update for staff review.

**ORIGINAL SIGNED BY:**

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 Division of Reactor Projects III/IV  
 Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Attachments: 1. List of Phone Call Attendees  
 2. Licensee Questions

cc w/atts: See next page

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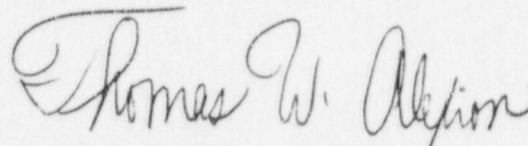
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extension in the December/January time frame that provides the scope, schedule and approach of a combined risk-informed and program update activity, along with the basis. This would be followed about 6 months later with a submittal regarding the licensee's overall risk-informed program and update for staff review.



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2. Licensee Questions

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CONFERENCE CALL BETWEEN STP NUCLEAR OPERATING COMPANY AND NRC

QUESTIONS CONCERNING RISK-INFORMED

INSERVICE INSPECTION AND/OR INSERVICE TESTING PROGRAMS

OCTOBER 8, 1998

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Questions concerning Risk Informed IST/ISI  
Conference Call on 10/08/98

ISI

Questions concerning the terms of the 2 year ISI extension

- Is the proposed NRC extension of 2 years in lieu of the existing 1 year extension currently allowed by the Code, or can the proposed 2 year NRC extension be appended to the existing 1 year Code extension?
- Under the terms of the proposed 2-year NRC extension, will the Licensee be allowed to perform only those activities required under the normal 10 year testing interval? In other words, does the 2-year extension allow the current 10-year testing interval to be completed without additional testing (e.g., pressure tests, reactor vessel exams)?
- What flexibility exists if the two-year extension is exceeded without full implementation of the Licensee's risk informed ISI/IST either through Licensee or NRC delays?

Questions concerning the Risk Informed program details

- Will the Risk Informed ISI programs require additional prescriptive requirements than that currently defined for Code Classes 2 and 3?
- What piping components are within the scope of Risk Informed ISI (e.g., piping welds, piping supports)? Are the Risk Informed ISI programs used for other component types (e.g., valve internals, pressure tests, integral attachments, bolting)?

Other questions concerning risk informed ISI .

- What is the cost for a NRC review?
- STPNOC currently has a pending code case on Class 1 BJ welds as part of an EPRI tailored collaboration project. How will this BJ Code Case be incorporated into the risk informed ISI program?
- Are there any restrictions to committing to the '95 Code without change providing 10CFR50.55a accepts the '98 Code while we are in development?
- Once a risk informed ISI program is satisfactorily implemented, will ISI program updates be required as a result of future versions of the ASME Section XI Code or revisions to 10CFR50.55a (i.e., 10 year updates would be eliminated)?

Questions concerning Risk Informed IST/ISI  
Conference Call on 10/08/98

IST

Questions concerning risk informed IST

- If we decide to implement Risk Informed programs, and are granted approval of a submittal, will the Licensee be allowed to transition from the code of record to a date determined by a consensus schedule of both the NRC and STP?
- Will it be allowed to commit to the 95 code as discussed earlier in the ISI questions?
- As discussed earlier, should the extension request expiration date be exceeded can the extension also be moved proportionately?
- Once a risk informed IST program is satisfactorily implemented, will IST program updates be required as a result of future versions of the ASME O&M Code or revisions to 10CFR50.55a (i.e., 10 year updates would be eliminated)?