

The Light company

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File No.: T7.3

Mr. Vincent S. Noonan, Project Director
PWR Project Directorate #5
U. S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Preservice Inspection of Component Supports; Relief Request

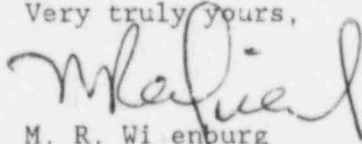
Dear Mr. Noonan:

As discussed with members of your staff (N. P. Kadambi, G. Johnson) HL&P is requesting relief from ASME Section XI PSI (Preservice Inspection) Examination Requirement IWF-2200(B) (1980 w/Winter 1981 Addenda) for certain component supports. This requirement states that "all examinations shall be performed following the initiation of hot functional tests," but does not consider systems or portions of systems not affected by hot functional testing.

The relief request, included in the Attachment, also includes a table which shows piping systems which undergo thermal expansion testing and have component supports subject to PSI examination. Because component support inspection is scheduled to begin during July 1986, your prompt attention to this request is appreciated.

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

Very truly yours,



M. R. Wiensburg
Manager, Nuclear Licensing

JSP/yd

Attachment: Relief Request for PSI of Component Supports

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cc:

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Revised 12/2/85

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Request For Relief From ASME Boiler and Pressure Vessel Code -
Section XI Requirements - Preservice Inspection - Component Supports

- A. COMPONENTS AFFECTED: Component Support Examination Program During Preservice Inspection (PSI)
- B. SECTION XI PSI EXAMINATION REQUIREMENT - IWF-2200(B) (1980 w/Winter 1981 Addenda) states that "all examinations shall be performed following the initiation of hot functional tests".
- C. BASIS FOR REQUESTING RELIEF: The above requirement does not take into consideration those systems or portions of systems which are not heated or which are not affected by heat-up during hot functional testing (HFT), nor does it take into consideration those aspects of VT examinations that are not affected by the thermal expansion of the piping system, i.e., missing parts, locknuts, weld spatter, agreement with drawings, erosion, corrosion, etc. HL&P's PSI program contains approximately 1500 supports. Performing thorough examinations on these supports after initiation of HFT would create scheduling, access and manpower problems during the time period between initiation of HFT and start of low power testing.
- D. ALTERNATE EXAMINATIONS: (1) For those non-exempt systems or portions of systems which are not affected* by heat-up during thermal expansion testing at HFT or power ascension testing (PAT), the required VT-3 and VT-4 (if applicable) examinations may be performed completely, prior to initiation of HFT, but not to exceed 12 months. (2) For those non-exempt systems or portions of systems which are affected* by the heat-up during thermal expansion testing (see Attachment 1), the required VT-3 and VT-4 examination, except setting verification and clearance checks, may be performed not more than 12 months prior to initiation of HFT, provided those same supports receive a post heat-up examination (if accessible**), to check for evidence of physical damage, misalignment, and bent or broken parts. Validity of the pre-HFT examination results will be assured by enforcement of administrative procedures which control the integrity of examined supports.
- * If a portion of a system exceeds 200 deg. F during the test, that portion is considered to be affected by the heat-up. Additionally, branch piping connected to portions of a system exceeding 200 deg. F during the test are considered to be affected by the heat-up.
- ** Those portions of systems heated only during PAT may be inaccessible due to ALARA considerations. Inaccessible supports will be documented accordingly in the examination records.

South Texas Project
 Units 1 and 2
 Docket Nos. STN 50-498, STN 50-499
 Request For Relief
 Preservice Inspection - Component Supports

Thermal Expansion Testing of Systems
 Subject to PSI Examination of Component Supports

| <u>Piping System</u> | <u>HFT</u> | <u>PAT</u> | <u>NR</u> |
|-----------------------------|------------|------------|-----------|
| Auxiliary Feedwater | X | X | |
| Component Cooling Water | | | X |
| Containment Spray | | | X |
| Chemical and Volume Control | X | | |
| Main Feedwater | X | X | |
| Main Steam | X | X | |
| Residual Heat Removal | X | | |
| Safety Injection | X | | |
| Essential Cooling Water | | | X |
| Diesel Generator System | | | X |
| Reactor Coolant | X | | |
| Essential Chilled Water | | | X |

Notes: HFT - Hot Functional Test Phase
 PAT - Power Ascension Test Phase
 NR - Not Required
 X - Test done during this phase