

The Light company

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File No.: G9.06
10CFR50.36

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Unit 1
Docket No. STN 50-498
Exemption Request for Final Draft Technical
Specification (Tech Spec) Surveillance Requirement 4.3.4.2.d

The subject Surveillance Requirement requires that at least every 40 months one each of the high pressure turbine stop valves and governor valves, and the low pressure turbine reheat stop valves and intercept valves be disassembled, and a visual and surface inspection performed on the valve seats, disks, and stems to verify that no unacceptable flaws or excessive corrosion exists.

HL&P requests that exemption be granted to the subject Surveillance Requirement for the initial disassembly and inspection of the turbine reheat intercept valves. This request is based on the following:

- 1) The valves have not been in service; therefore, no degradation from in-service conditions is possible.
- 2) The valves are identical in make and model to the turbine reheat stop valves, two of which have been disassembled and satisfactorily inspected.
- 3) Three turbine reheat intercept valves have been visually inspected without disassembly of the valve. This inspection covered the seat, disk, and part of the stem.
- 4) The valves were known to be in good condition based on the manufacturer's records provided.

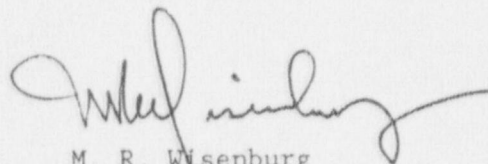
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HL&P has performed the required surveillance on the other types of turbine valves. However, the literal interpretation of the Tech Spec was not met in the case of the turbine reheat intercept valves. Based on the above information and a 4-6 week time restraint for removal, disassembly, and installation, HL&P does not consider this Surveillance Requirement necessary or prudent for the initial surveillance of the reheat intercept valve.

If you should have any questions on this matter, please contact Ms. Frostie A. White at (512) 972-7985.

A handwritten signature in dark ink, appearing to read 'M. R. Wisenburg', with a stylized, flowing script.

M. R. Wisenburg
Manager, Engineering and Licensing

FAW/ljm

cc:

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