



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

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September 1, 2022  
NOC-AE-22003914  
10 CFR 50.55a  
STI: 35359432

Attention: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498 and STN 50-499  
Response to NRC Comments on Relief Request RR-ENG-3-25


References:

1. Letter from C. Georgeson, STPNOC, to NRC Document Control Desk, "Request for Relief from ASME Section XI Code Requirements for Weld Examinations (Relief Request RR-ENG-3-25)," dated September 23, 2021 (NOC-AE-21003841) (ML21266A426).
2. Email from D. Galvin, NRC, to W. Brost, STPNOC, "STP Relief Request RR-ENG-3-25 Editorial Issues," August 3, 2022 (AE-NOC-22003345)
3. Email from D. Galvin, NRC, to W. Brost, STPNOC, "STP Nuclear Operating Company Relief Request RR-ENG-3-25 Clarification Needed," April 11, 2022 (AE-NOC-22003347)

In response to References 2 and 3, STP Nuclear Operating Company (STPNOC) submits the information provided in the enclosure to this letter in support of the review of Relief Request RR-ENG-3-25.

There are no commitments in this letter.

If there are any questions regarding this letter, please contact Tim Hammons at (361) 972-7347 or me at (361) 972-7806.

  
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General Manager, Engineering

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Enclosure: Response to NRC Comments on Relief Request RR-ENG-3-25

cc:

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**Response to NRC Comments on Relief Request RR-ENG-3-25**

**NRC Comment 1**

Item C1.30 is identified as within scope of the request, but no information is provided on this item in the request. Clarify if it is in scope and if so, provide applicable information for this item.

**STP Response**

Item C1.30 is not within the scope of this relief request and was included in error in the previous submittal.

**NRC Comment 2**

8-RH-1106-KB2, Weld 13: Identified as 8-RH-1106-KB2, Weld 13 in Attachment 1, Table 1 and as 8-RH-1006-KB2, Weld 13 in Attachment 1 Section 1.3 and possibly 8-RH-1107-BB2 in Figure 1.3-1 (The pointer to "13" is labeled 8-RH-1107-BB2 why the label 8-RH-1106-KB2 is pointing off the figure). Clarify the correct designation.

**STP Response**

The designation in Attachment 1 Section 1.3 contains a typographical error and Figure 1.3-1 was inadvertently clipped such that the label for 8-RH-1106-KB2 was pointing off the figure. The correct designation is 8-RH-1106-KB2, Weld 13 and a revised more expansive version of Figure 1.3-1 follows:

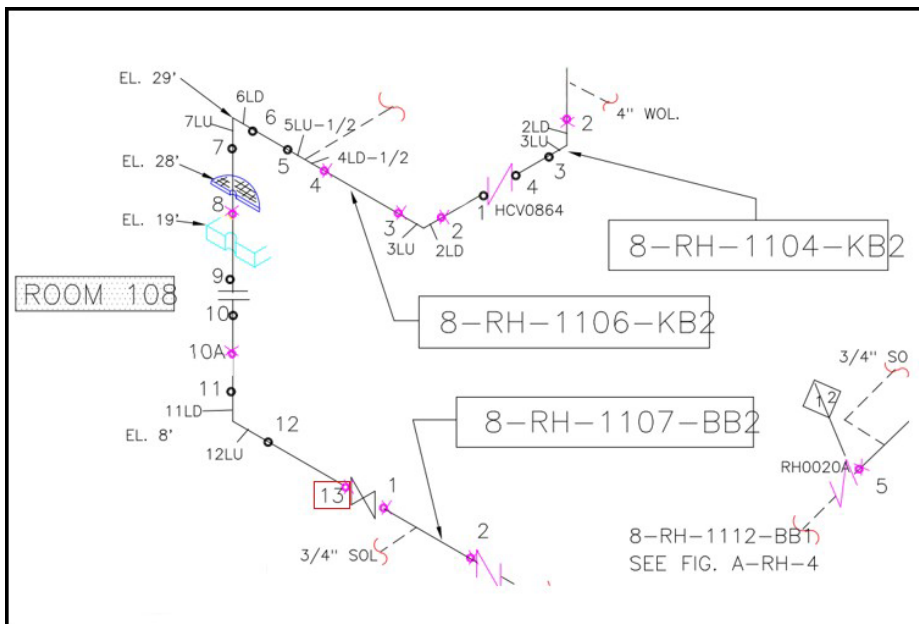


Figure 1.3-1 8-RH-1106-KB2, Weld 13 (Extracted from Reference DWG B-RH-7)

**NRC Comment 3**

8-RH-2106-KB2, Weld 13: Identified as 8-RH-2106-KB2, Weld 13 in Attachment 1, Table 1 and as 8-RH-2106-BB2, Weld 13 in Attachment 1 Section 2.5 and as 8-RH-2107-BB2 in Attachment 1, Figure 2.5-1. Clarify the correct designation.

**STP Response**

The designation in Attachment 1 Section 2.5 contains a typographical error and Figure 2.5-1 was inadvertently clipped such that the label for line 8-RH-2106-KB2 was not visible. The correct designation is 8-RH-2106-KB2, Weld 13 and a revised more expansive version of Figure 2.5-1 follows:

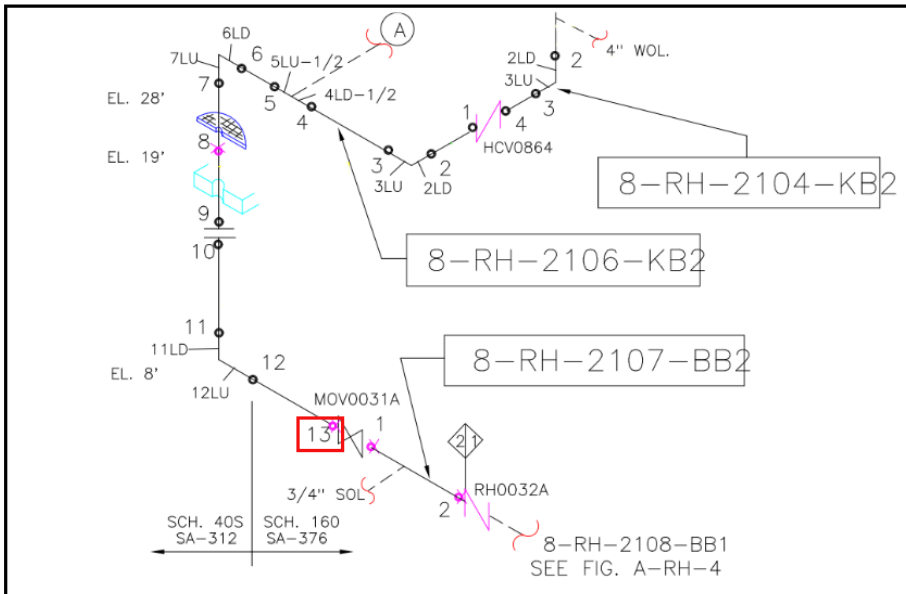


Figure 2.5-1 8-RH-2106-KB2, Weld 13 (Extracted from Reference DWG B-RH-7)

**NRC Comment 4**

4-RC-2422-BB1, Weld 24: Identified as 4-RC-2422, Weld 24 in Attachment 1, Table 1 and as 4-RC-2422-BB1, Weld 24 in Attachment 1, Section 2.7 and associated figure. Clarify the correct designation.

**STP Response**

The designation in Attachment 1, Table 1 was missing the extension “-BB1.” The correct designation is 4-RC-2422-BB1, Weld 24.

**NRC Comment 5**

There seems to be a discrepancy/typographical error in the licensee’s submittal for pressurizer weld PRZ-2-N3, nozzle-to-vessel weld (relief nozzle to head). In Table 1 of Attachment 1 to the relief request, the weld is identified as “relief nozzle to [pressurizer] head.” The title of Item 2.1 on page 31 also shown PRZ-2-N3 as “pressurizer relief nozzle to head.” However, on page 31, Figure 2.1-1 identifies PRZ-2-N3 as a safety nozzle (encircled in the red rectangle box). Please confirm whether PRA-2-N3 is for a weld associated with the relief valve nozzle or the safety valve nozzle.

**STP Response**

The correct designation for weld PRZ-2-N3 is Pressurizer Safety Nozzle to Shell Weld.

**NRC Comment 6**

*There is also a minor discrepancy related to Category R-A piping Item Nos., specifically on page 1 of the enclosure the licensee states "R1.11, and R2.20," however on the next page (2) as well as the balance of the submittal the licensee refers to the Category R-A items as R1.11, and R1.20.*

**STP Response**

The correct designation is R1.11 and R1.20.