



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

November 29, 1999
NOC-AE-000636
File No.: G09.16
10CFR50.55a

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


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
Requirement for Use of Code Case N-574 (Relief Request RR-ENG-2-11)

In accordance with the provisions of 10CFR50.55a(a)(3)(i), the South Texas Project requests relief from the ASME Section XI code nondestructive examination personnel requalification requirements of IWA-2314, "Certification and Recertification," for the second inservice inspection interval of Units 1 and 2. IWA-2314 requires that Level I and Level II non-destructive examination personnel be recertified by qualification examination every three years. The South Texas Project requests Nuclear Regulatory Commission approval to use Code Case N-574, "NDE Personnel Recertification Frequency," extending the requalification period to five years. The South Texas Project believes this alternative requalification period provides an acceptable level of quality and safety.

The attached relief request discusses the basis and justification for the relief request and includes an implementation schedule. Note that Code Case N-574 has not yet been approved by the Nuclear Regulatory Commission in Regulatory Guide 1.147.

The South Texas Project requests Nuclear Regulatory Commission review and approval of this relief request by June 1, 2000, to support development and submittal of the Unit 1 and 2 Ten Year Inservice Inspection Plan for the second interval.

If there are any questions, please contact either Mr. C. A. Murry at (361) 972-8285 or me at (361) 972-7902.


P. J. Jordan
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PLW/

Attachment: Request for Relief from ASME Boiler and Pressure Vessel Code Section XI
Requirement IWA-2314 (Relief Request RR-ENG-2-11)

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U. S. Nuclear Regulatory Commission
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**South Texas Project
Units 1 and 2
Request for Relief from ASME Boiler and Pressure Vessel Code Section XI
Requirement for Use of Code Case N-574 (Relief Request RR-ENG-2-11)**

Reference Code: ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition

A. Components for Which Exemption is Requested:

(a) Name and Identification Number: Not Applicable

(b) Function: Not Applicable

(c) Class: Not Applicable

B. Code Requirement from Which Relief is Requested:

ASME Section XI code Subparagraph IWA-2314 requires that Level I and Level II nondestructive examination personnel be recertified by qualification examination every three years.

C. Basis for Relief from Code Requirements:

The South Texas Project requests relief from IWA-2314 in accordance with the provisions of 10CFR50.55a(a)(3)(i). Recertification of nondestructive examination personnel every three years is an unnecessary burden.

D. Alternative Requirement:

The South Texas Project proposes that Level I and Level II nondestructive examination personnel be recertified by qualification examination every five years in accordance with Code Case N-574, "NDE Personnel Recertification Frequency." A copy is attached.

The Nuclear Regulatory Commission has not yet generically approved Code Case N-574 in Regulatory Guide 1.147.

E. Justification for Granting Relief:

Recertification of Level I and Level II nondestructive examination personnel by qualification examination every five years in accordance with ASME Section XI Code Case N-574 will provide an acceptable level of quality and safety. A five-year recertification period is consistent with Section XI requirements for Level III personnel and with other ASME codes and international standards. Section XI requirements for

annual practice by nondestructive examination personnel also support the proposed alternative.

Extension of the required recertification period from three years to five years is supported by the following considerations, which were the basis for ASME approval of Code Case N-574:

- Section XI is one of the very few standards requiring recertification by examination every three years. Other ASME code sections (e.g., Section III) rely on the employer to recertify NDE personnel in accordance with the guidelines of SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing." This guideline allows recertification of NDE personnel based on continuing satisfactory performance.
- Guidance was taken from ISO 9712, "Non-destructive testing -- Qualification and certification of personnel," in establishing the proposed five-year recertification period. ISO 9712 requires recertification by examination every ten years and recertification by satisfactory performance every five years.
- One of the most important aspects of satisfactory performance is annual practice for detecting and sizing flaws. There is a good correlation between practice and successful completion of the Appendix VIII performance demonstrations. Supplemental training is required by Appendix VII on an annual basis to impart knowledge of new developments, material failure modes, and any pertinent technical topics as determined by the employer. This annual practice requirement will have a much larger impact on satisfactory nondestructive examination performance than elapsed time between recertification examinations.

F. Implementation Schedule:

The South Texas Project requests approval from the Nuclear Regulatory Commission to use Code Case N-574 in recertifying non-destructive examination personnel for the second ten-year inservice inspection interval of Units 1 and 2. The Nuclear Regulatory Commission is requested to review and approve this relief request by June 1, 2000, to support development and submittal of the Unit 1 and Unit 2 Ten Year Inservice Inspection Plan for the second interval.

**CASE
N-574**

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: August 14, 1997

*See Numeric Index for expiration
and any reaffirmation dates.*

**Case N-574
NDE Personnel Recertification Frequency
Section XI, Division 1**

Inquiry: IWA-2314 requires Level I and Level II personnel to be recertified by qualification examination every 3 years. What alternative requirements may be used to recertify Level I and Level II personnel?

Reply: It is the opinion of the Committee that, as an alternative to the 3 year recertification requirements of IWA-2314, Level I and Level II personnel may be recertified by qualification examination every 5 years.