

Mr. William T. Cottle  
 President and Chief Executive Officer  
 STP Nuclear Operating Company  
 South Texas Project Electric  
 Generating Station  
 P. O. Box 289  
 Wadsworth, TX 77483

December 2, 1999

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - IMPLEMENTATION OF  
 SUBSECTION IWE OF ASME SECTION XI FOR CONTAINMENT  
 INSPECTION, RELIEF REQUEST RR-ENG-IWE-01, (TAC NOS. MA6852 AND  
 MA6853)

Dear Mr. Cottle:

By letter dated October 7, 1999, STP Nuclear Operating Company (STPNOC) submitted relief request RR-ENG-IWE-01 for relief from the American Society of Mechanical Engineers Code, Section XI, Table IWE-2500-1 requirements for VT-3 visual examination of seals and gaskets on airlocks, hatches, and other devices required to assure containment leak-tight integrity. STPNOC proposes to use, in lieu of performing the VT-3 examinations for containment penetration seals and gaskets, the current program for leakage testing containment penetrations in accordance with 10 CFR Part 50, Appendix J.

The Nuclear Regulatory Commission staff has evaluated the information provided by STPNOC in relief request RR-ENG-IWE-01. The staff concludes that compliance with the Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety, and that STPNOC's proposed alternative will provide reasonable assurance of containment pressure integrity. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii). Our related safety evaluation is enclosed.

Sincerely,  
 ORIGINAL SIGNED BY  
 Robert A. Gramm, Chief, Section 1  
 Project Directorate IV & Decommissioning  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Safety Evaluation

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South Texas, Units 1 & 2

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