

November 20, 2000

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

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - REQUESTS FOR RELIEFS
(RR-ENG-IWE-02 THROUGH RR-ENG-IWE-05) FROM ASME CODE,
SECTION XI REQUIREMENTS (TAC NOS. MA9168 THROUGH MA9175)

Dear Mr. Cottle:

By four separate letters dated June 6, 2000, as supplemented by two separate letters dated September 18, 2000, the STP Nuclear Operating Company (STPNOC) submitted requests (RR-ENG-IWE-02 through RR-ENG-IWE-05) seeking relief from the requirements of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers (ASME) Code for its South Texas Project Electric Generating Station, Units 1 and 2. Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC [concrete containment] and Class MC [metallic containment] components of light-water cooled nuclear power plants.

Based on the information provided in the June 6, 2000, letters and the September 18, 2000, letters, we have concluded that the STPNOC's proposed alternative will provide an acceptable level of quality and safety for RR-ENG-IWE-02. Therefore, the proposed alternative is hereby authorized pursuant to 10 CFR 50.55a(a)(3)(i). For RR-ENG-IWE-03, 04, and 05, we have concluded that compliance with the code requirements would result in a hardship without a compensating increase in the level of quality and safety, and that STPNOC's proposed alternatives will provide reasonable assurance of containment pressure integrity. Therefore, these proposed alternatives are hereby authorized pursuant to 10 CFR 50.55a(a)(3)(ii). RR-ENG-IWE-02 through RR-ENG-IWE-05 are for the first-10 year inspection interval for Units 1 and 2.

The staff's evaluation and conclusions are contained in the enclosed safety evaluation. Should you have questions regarding this safety evaluation, please contact Mr. T. J. Kim, of my staff at 301-415-1392.

Sincerely,

/RA/

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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Safety Evaluation

cc w/encl: See next page

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February 2000

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
REQUESTS FOR RELIEFS (RR-ENG-IWE-02, 03, 04, and 05)
FROM ASME CODE REQUIREMENTS FOR
CONTAINMENT INSERVICE INSPECTION PROGRAM
SOUTH TEXAS PROJECT, UNITS 1 AND 2
STP NUCLEAR OPERATING COMPANY
DOCKET NOS. 50-498 AND 50-499

1.0 INTRODUCTION

Section 50.55a(g) of Title 10 of the *Code of Federal Regulations* (10 CFR) requires that inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (hereafter called ASME Code) and the applicable addenda, except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). The regulation at 10 CFR 50.55a(a)(3) states in part that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that ISI of components conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein.

As published in the *Federal Register* dated August 8, 1996 (61 FR 41303), the NRC amended its regulations to incorporate by reference the 1992 edition (including the 1992 Addenda of Subsections IWE and IWL) of the ASME Code, Section XI. Subsections IWE and IWL provide the requirements for ISI of Class CC [concrete containment] and Class MC [metallic containment] components of light-water cooled nuclear power plants. The effective date of the

amended regulation was September 9, 1996, and it requires the licensees to incorporate the new requirements into their ISI plans and to complete the first containment inspection by September 9, 2001.

By four separate letters dated June 6, 2000 (Ref. 1-4), the licensee, STP Nuclear Operating Company, submitted requests (RR-ENG-IWE-02 through RR-ENG-IWE-05) seeking relief from the requirements of Subsections IWE and IWL for its South Texas Project (STP) Electric Generating Station, Units 1 and 2. For each relief request, the licensee proposed an alternative to the requirements of Subsections IWE and IWL. The staff's evaluation of the subject relief requests is presented below.

2.0 EVALUATION

2.1 Relief Request RR-ENG-IWE-02

2.1.1 Code Requirements

ASME Code, Section XI, Subsection IWE-2200(g), 1992 Edition requires that the condition of the new paint or coating shall be documented in the preservice examination records when paint or coatings are reapplied.

2.1.2 Specific Relief Requested

Relief is requested from documenting the condition of reapplied protective coatings in the preservice examination records. This relief request pertains to all reapplied paint and coatings for the STP Class MC and metallic liners of Class CC components.

2.1.3 Basis for Relief

Existing paint and coating inspection practices at STP provide an adequate level of quality and safety. The STP Paints and Coatings Program provides for examination of painted surfaces and repair of nonconforming conditions. Documenting the condition of reapplied paint and coatings in the preservice examination records does not increase the level of quality and safety of the reactor containment. Recording the condition of reapplied paint and coatings in the preservice records also does not substantiate the structural integrity of the reactor containment.

2.1.4 Proposed Alternative

Paint and coatings reapplied to the Class MC and metallic liners of Class CC component surfaces are examined in accordance with the existing plant requirements provided in the STP Paints and Coatings Program to ensure that acceptance standards are met at the time of application. Local areas that do not meet the specified requirements are repaired and reinspected.

2.1.5 Justification for Granting Relief

The alternative to IWE-2200(g) proposed by this relief request will provide an acceptable level of quality and safety consistent with the provisions of 10 CFR 50.55a(a)(3)(i).

The STP Paints and Coatings Program ensures that reapplications of paint and coatings satisfy applicable requirements. This program governs application and maintenance of paint and coatings, including inspection and quality assurance provisions. Local areas not meeting the specified requirements for paint or coatings are corrected in accordance with procedural requirements and reinspected to ensure requirements are met. Consequently, documenting the condition of reapplied paints and coatings in the preservice examination records serves no purpose related to ensuring continued satisfactory performance of paint and coatings.

If paint or coating is found to have deteriorated while in service, the affected area is evaluated to identify corrective actions, regardless of the preservice record of the protective coating. Therefore, recording the condition of reapplied paint and coatings in the preservice record will not increase the level of quality and safety of the containment structure and there is no value added by recording the condition in the preservice record.

2.1.6 Staff Evaluation of RR-ENG-IWE-02

In lieu of performing a preservice inspection of new paint or coatings in accordance with the requirements specified in Subsection IWE-2200(g), the licensee proposed to examine the paint and coatings in accordance with the STP Paint and Coatings Program. The licensee stated that this program ensures reapplications of paint and coatings satisfy the applicable requirements and governs application and maintenance of paint and coatings, including inspection and quality assurance provisions. If paint or coating is found to have deteriorated while in service, the affected area is evaluated to identify corrective actions, regardless of the preservice record of the protective coating.

The staff notes that the STP Paint and Coatings Program was previously reviewed and approved by the staff in a letter dated February 1, 2000 (Ref. 5).

Based on the above, the staff finds that the use of STP's Paint and Coatings Program for the examination of new paint or coatings of the nonsubmerged, accessible surface areas will provide an acceptable level of quality and safety for protecting the containment components. Therefore, the staff hereby authorizes the proposed alternative in RR-ENG-IWE-02, pursuant to 10 CFR 50.55a(a)(3)(i) for the first-10 year inspection interval for Units 1 and 2.

2.2 Relief Request RR-ENG-IWE-03

2.2.1 Code Requirements

ASME Code, Section XI, Subsection IWE-2500(b), requires that the paint or coatings shall be visually examined prior to removal in accordance with Table IWE-2500-1 when paint or coatings are to be removed.

2.2.2 Specific Relief Requested

Relief is requested from performing visual examination of paint or coatings in accordance with Table IWE-2500-1 prior to removal.

2.2.3 Basis for Relief

Existing paint and coating inspection practices at STP provide an adequate level of quality and safety. STP's Paint and Coatings Program provides for examinations of painted surfaces and correction of nonconforming conditions. There is little value added by examining an area that may have no visible flaws in what could be considered a "spot check."

2.2.4 Proposed Alternative

Paints and coatings on the Class MC and metallic liners of Class CC component surfaces are examined in accordance with existing plant requirements provided in the STP Paints and Coatings Program. The paint and coatings will not necessarily be examined just prior to removal. Surface areas that do not meet the specified requirements are repaired and reinspected.

2.2.5 Justification for Granting Relief

The alternative to the requirements of IWE-2500(b) proposed in this relief request will provide an acceptable level of quality and safety consistent with the provisions of 10 CFR 50.55a(a)(3)(i). The paint and coatings on Class MC and metallic liners of Class CC component surfaces are inspected under the STP Paints and Coatings Program. Surface areas that do not meet the specified requirements are repaired and reinspected. Therefore, inspection of paints and coatings prior to their removal from the Class MC and metallic liners of Class CC component surfaces should not be necessary.

2.2.6 Staff Evaluation of RR-ENG-IWE-03

In lieu of performing visual examination of paint or coatings prior to removal in accordance with Table IWE-2500-1, the licensee proposed to use the STP Paints and Coatings Program for the examination of paints and coatings on the Class MC and metallic liners of Class CC component surfaces.

As discussed in the evaluation of Relief Request RR-ENG-IWE-02, the staff finds that the STP Paints and Coatings Program is adequate for monitoring the proper removal of the old paint and application of new coatings, and therefore, the STP Paints and Coatings Program will provide an acceptable level of quality and safety for protecting the containment components. Based on the above, the staff hereby authorizes the proposed alternative in RR-ENG-IWE-03, pursuant to 10 CFR 50.55a(a)(3)(i) for the first-10 year inspection interval for Units 1 and 2.

2.3 Relief Request RR-ENG-IWE-04

2.3.1 Code Requirements

ASME Code, Section XI, paragraph IWE-2420(b) requires that when component examination results require evaluation of flaws, areas of degradation, or repairs in accordance with IWE-3000, and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be reexamined during the next inspection period. Paragraph IWE-2420(c) requires that when the reexaminations required by IWE-2420(b) reveal that the flaws, areas of degradation, or repairs remain essentially

unchanged for three consecutive inspection periods, the areas containing such flaws, degradation, or repairs no longer require augmented examination.

2.3.2 Specific Relief Requested

Relief is requested from the requirement of paragraphs IWE-2420(b) and IWE-2420(c) to perform successive examination of repaired areas.

2.3.3 Basis for Relief

Pursuant to the provisions of 10 CFR 50.55a(a)(3)(ii), relief is requested from the requirement of paragraphs IWE-2420(b) and IWE-2420(c) to perform successive examination of repaired areas because compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee's letter dated September 18, 2000 (Ref. 6), stated that performing these examinations may result in increased radiation dose to those performing the examinations and additional expense will be incurred.

2.3.4 Proposed Alternative

Successive examinations in accordance with paragraphs IWE-2420(b) and IWE-2420(c) are not required for repaired areas.

2.3.5 Justification for Granting Relief

The purpose of a repair is to restore a component to an acceptable condition for continued service in accordance with the acceptance standards of IWE-3000. IWE-3000, referenced by IWE-2420(b), provides the acceptance standards to be applied in evaluating the results of the required nondestructive examination. IWE-3114 states that repairs and reexaminations shall comply with the requirements of IWA-4000. IWA-4150, "Verification of Acceptability," states the following:

Prior to authorizing a repair or the installation of an item to be used for replacement, the owner shall conduct an evaluation of the suitability of the repair or item to be used for replacement including consideration of the cause of failure. In addition, when repair or replacement is required because of failure of an item, the evaluation shall consider the cause of failure of the existing item to ensure that the selected repair or replacement item is suitable.

If the repair has restored the component to an acceptable condition, successive examinations are not warranted. If the repair does not meet the applicable code requirements, then the repair is not suitable and the component is not acceptable for continued service.

Paragraphs IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require a repair to be subject to successive examination requirements. Successive examinations of repaired areas are only required under IWE-2420(b).

If a repaired area is subject to degradation, augmented examination is required in accordance with IWE-3512 for Examination Category E-C. Consequently, in the absence of such

degradation, requiring successive examination of repairs in accordance with IWE-2420(b) and IWE-2420(c) constitutes a burden without a compensating increase in quality or safety.

2.3.6 Staff Evaluation of RR-ENG-IWE-04

Subsection IWA-4150 requires evaluation of the code repairs to determine the suitability and acceptability of the repair. When a repair is required because of failure of a component, the evaluation shall consider the cause of the failure to ensure that the repair is suitable. Considering that the failure mechanism is identified and corrected as required and the repair receives preservice examinations, as required, the proposed alternative, as described above, will provide a reasonable assurance of structural integrity. Therefore, the requirements of successive examinations are deemed unnecessary. Furthermore, the staff notes that IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require the successive inspection of repairs for ASME Code Class 1, 2, and 3 components that are comparable to the ASME Code Class MC components, in terms of the safety significance. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) for the first-10 year inspection interval for Units 1 and 2, since compliance with the code requirements in this case would result in hardship (potential increase in radiation dose to those performing the examination) without a compensating increase in the level of quality and safety.

2.4 Relief Request RR-ENG-IWE-05

2.4.1 Code Requirements

ASME Code, Section XI, Table IWE-2500-1, Examination Category E-G, Item Number E8.20, requires that a bolt torque or tension test be conducted on bolted connections that have not been disassembled and reassembled during the inspection interval.

2.4.2 Specific Relief Requested

Relief is requested from performing the code-required torque or tension test on the bolted connections.

2.4.3 Basis for Relief

ASME Code, Section XI, Table IWE-2500-1, Examination Category E-G, Item No. E8.20, requires that a bolt torque or tension test be conducted on bolted connections that have not been disassembled and reassembled during the inspection interval. Compliance requires detensioning and subsequent retorquing of bolts in connections (or containment penetrations) for which acceptable leak-tight performance has been verified through 10 CFR Part 50, Appendix J, Type B testing. This constitutes a hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee's letter dated September 18, 2000 (Ref. 7), stated that performing these examinations may result in increased radiation dose to those performing the examinations and additional expense will be incurred.

2.4.4 Proposed Alternative

The following code-required examinations and tests ensure the structural integrity and the leak-tightness of Class MC pressure-retaining bolting:

- (1) Exposed surfaces of bolted connections receive a VT-1 visual examination in accordance with the requirements of Table IWE-2500-1, Examination Category E-G, Item No. E8.10.
- (2) Bolted connections shall meet the pressure test requirements of Table IWE-2500-1, Examination Category E-P, Item E9.40, and 10 CFR Part 50, Appendix J, Type B.

2.4.5 Justification for Granting Relief

Compliance with the requirements of Table IWE-2500-1, Examination Category E-G, Item No. E8.20, requires that bolting be detensioned and then retorqued or retensioned. This activity is considered a maintenance activity that potentially affects the sealing characteristics of the penetration connection and would require a 10 CFR Part 50, Appendix J, Type B test prior to detensioning and following retensioning.

Containment penetrations are tested for leakage in accordance with 10 CFR Part 50, Appendix J, Type B. Satisfactory performance of the Type B test proves that the bolt torque or tension is adequate to ensure the leak rate is within the acceptable limits. The torque or tension value of bolting only becomes an issue if the leak rate is excessive. Once a bolt is torqued or tensioned, it is not subject to dynamic loading that could result in significant change. In addition, exposed surfaces of bolted connections require a VT-1 visual examination in accordance with the requirements of Table IWE-2500-1, Examination Category E-G, Item No. 8.10, once during each inspection interval pursuant to IWE-2400. Therefore, Appendix J testing and VT-1 visual inspection are adequate to demonstrate that the bolting design function is met.

2.4.6 Staff Evaluation of RR-ENG-IWE-05

ASME Code, Section XI, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item E8.20, requires bolt torque or tension testing on bolted connections that have not been disassembled and reassembled during the inspection interval. This examination is used to aid in the determination that leak-tight seals exist and that the structural integrity of the subject bolted connections is maintained. In lieu of meeting the requirement that a bolt torque or tension test be performed where the connection has not been disassembled or reassembled during the inspection interval, the licensee proposed to use the 10 CFR Part 50, Appendix J, Type B test together with the visual examination in accordance with requirements of Table IWE-2500-1, Item E8.10, as an alternative.

The staff has determined that compliance with the ASME Code requirements in this case will cause a hardship or unusual difficulty because untorquing and subsequent retorquing bolted connections involve unnecessary radiation exposure to perform the work without a compensating increase in the level of quality and safety. The alternative approach proposed by the licensee, specifically the leak rate test required by 10 CFR Part 50, Appendix J, together

with VT-1 visual examination of bolted connections to verify the containment integrity, will provide reasonable assurance of the containment pressure boundary integrity. Therefore, the staff concludes that the alternative, as proposed in RR-ENG-IWE-05, is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) for the first-10 year inspection interval for Units 1 and 2, since compliance with the code requirements in this case would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

3.0 CONCLUSION

Based on its review of the information provided in the subject requests for relief (RR-ENG-IWE-02, 03, 04, and 05), the staff concludes that for RR-ENG-IWE-02, the licensee's proposed alternative will provide an acceptable level of quality and safety. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i). For RR-ENG-IWE-03, 04, and 05, the staff concludes that compliance with the code requirements would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety, and that the licensee's proposed alternatives will provide reasonable assurance of containment integrity. Therefore, these proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

4.0 REFERENCES

1. Letter, T. J. Jordan, STP, to NRC, "Request for Relief from ASME Boiler and Pressure Vessel Code Section XI, Subsection IWE-2200(g) (Relief Request RR-ENG-IWE-02)," dated June 6, 2000.
2. Letter, T. J. Jordan, STP, to NRC, "Request for Relief from ASME Boiler and Pressure Vessel Code Section XI, Subsection IWE-2500(b) (Relief Request RR-ENG-IWE-03)," dated June 6, 2000.
3. Letter, T. J. Jordan, STP, to NRC, "Request for Relief from ASME Boiler and Pressure Vessel Code Section XI, Subsections IWE-2420(b) and IWE-2420(c) (Relief Request RR-ENG-IWE-04)," dated June 6, 2000.
4. Letter, T. J. Jordan, STP, to NRC, "Request for Relief from ASME Boiler and Pressure Vessel Code Section XI, Table IWE-2500-1, Item No. E8.20 (Relief Request RR-ENG-IWE-05)," dated June 6, 2000.
5. Letter, John A. Nakoski, NRC, to William T. Cottle, STP, "South Texas Project, Units 1 and 2 - Generic Letter 98-04, 'Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment,'" dated February 1, 2000.
6. Letter, T. J. Jordan, STP, to NRC, "Amended Request for Relief from ASME Boiler and Pressure Vessel Code Section XI, Subsections IWE-2420(b) and IWE-2420(c) (Relief Request RR-ENG-IWE-04)," dated September 18, 2000.
7. Letter, T. J. Jordan, STP, to NRC, "Amended Request for Relief from ASME Boiler and Pressure Vessel Code Section XI, Table IWE-2500-1, Item No. E8.20 (Relief Request RR-ENG-IWE-05)," dated September 18, 2000.

Principal Contributor: T. Cheng

Date: November 20, 2000

November 20, 2000

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SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - REQUESTS FOR RELIEFS
(RR-ENG-IWE-02 THROUGH RR-ENG-IWE-05) FROM ASME CODE,
SECTION XI REQUIREMENTS (TAC NOS. MA9168 THROUGH MA9175)

Dear Mr. Cottle:

By four separate letters dated June 6, 2000, as supplemented by two separate letters dated September 18, 2000, the STP Nuclear Operating Company (STPNOC) submitted requests (RR-ENG-IWE-02 through RR-ENG-IWE-05) seeking relief from the requirements of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers (ASME) Code for its South Texas Project Electric Generating Station, Units 1 and 2. Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC [concrete containment] and Class MC [metallic containment] components of light-water cooled nuclear power plants.

Based on the information provided in the June 6, 2000, letters and the September 18, 2000, letters, we have concluded that the STPNOC's proposed alternative will provide an acceptable level of quality and safety for RR-ENG-IWE-02. Therefore, the proposed alternative is hereby authorized pursuant to 10 CFR 50.55a(a)(3)(i). For RR-ENG-IWE-03, 04, and 05, we have concluded that compliance with the code requirements would result in a hardship without a compensating increase in the level of quality and safety, and that STPNOC's proposed alternatives will provide reasonable assurance of containment pressure integrity. Therefore, these proposed alternatives are hereby authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

The staff's evaluation and conclusion are contained in the enclosed safety evaluation. Should you have questions regarding this safety evaluation, please contact Mr. T. J. Kim, of my staff at 301-415-1392.

Sincerely,

/RA/

Robert A. Gramm, Chief, Section 1
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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Safety Evaluation

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ACCESSION NUMBER: ML003770277

* No substantive change from SE **See previous concurrence

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