

December 14, 2001

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, UNIT 1 - EVALUATION OF THE INFORMATION  
REGARDING THE EXAMINATION BY A SUBMERGED CAMERA INSIDE THE  
REFUELING WATER STORAGE TANK (TAC NO. MB1413)

Dear Mr. Cottle:

By letter dated February 15, 2001, as supplemented by letter dated October 25, 2001, the STP Nuclear Operating Company (the licensee) submitted additional information to supplement its previously approved (for one fuel cycle) evaluation of the refueling water storage tank (RWST) flaw for South Texas Project, Unit 1 (STP, Unit 1). The licensee provided justification for continued operation of STP, Unit 1 beyond one fuel cycle. The evaluation dated February 22, 2000, was submitted as part of a relief request to use the 1989 Edition instead of the 1983 Edition of the American Society of Mechanical Engineers (ASME) Code. The 1989 Edition of the Code permits the licensee to use analytical evaluation of component leakage in lieu of repair or replacement. The NRC approved this relief request and issued a safety evaluation (SE) on June 22, 2000, for the STP, Unit 1 to operate for one fuel cycle. That decision acknowledged the fact that the licensee did not examine the flaw indication from the inside of the tank and could not characterize the flaw according to the Code.

On August 23, 2001, the licensee performed a visual examination, from inside the RWST, by a certified visual examiner using a video camera mounted on a remotely controlled submersible device. Detailed information regarding the examination and the findings was provided in the letter of October 25, 2001. The underwater resolution of 1/32" was verified by a visual resolution test card placed inside the tank. This resolution was achieved with the help of good water clarity and tank cleanliness. The examination results indicated no evidence of baseplate or sidewall cracking inside the tank. Based on this, the licensee concluded that the future inspections need be conducted only as required by the Code. The NRC staff has reviewed this information. Based on its review the NRC staff concludes that, considering the examination results and the large allowable flaw length of 63.6 inches (see the previous SE) for the baseplate, it is unlikely that the visual examination could miss a flaw of that size, and; therefore, the flaw characterization meets the intent of the Code and the STP, Unit 1 can be operated beyond one fuel cycle subject to future inspections required by Section XI of the Code only.

In addition to the RWST level indicators and alarms, which are continuously monitored from the main control room, the licensee's RWST monitoring plan includes routine visual inspection of the RWST once per shift, quarterly inspection of the flaw area by a VT-2 qualified engineer, and an inspection by a VT-2 qualified engineer following a safety injection system functional pressure test, which is performed every three years. This monitoring plan provides reasonable assurance that the RWST would have an acceptable level of quality and safety.

The NRC staff further determined that it is not necessary for the licensee to renew the relief request that was granted on June 22, 2000, regarding the RWST leakage because the licensee has upgraded its inservice inspection program to the 1989 Edition of the Code.

Sincerely,

**/RA/**

Mohan C. Thadani, Senior Project Manager, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-498

cc: See next page

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Mohan C. Thadani, Senior Project Manager, Section 1  
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