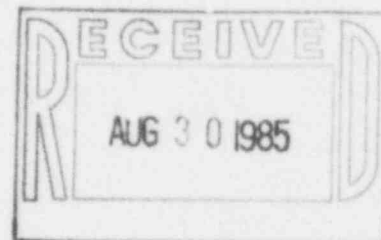


The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

August 27, 1985
ST-HL-AE-1331
File No.: G12.251

Mr. Robert D. Martin
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Final Report Concerning
Reactor Pressure Vessel Radiographs

Dear Mr. Martin:

On May 24, 1985, pursuant to 10CFR50.55(e), Houston Lighting & Power Company (HL&P) notified your office of a potentially reportable item concerning reactor pressure vessel radiographs. Subsequent review has determined that only a contractual deficiency was involved and had it gone undetected, no adverse impact on the safety of plant operations would have existed. Attached is the final report concerning this item.

If you should have any questions on this matter, please contact Mr. Michael E. Powell at (713) 993-1328.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Goldberg".

J. H. Goldberg
Group Vice President, Nuclear

CAA/yd

Attachment: Final Report Concerning
Reactor Pressure Vessel Radiographs

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PDR ADOCK 05000498
S PDR

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W2/NRC2/m

11-58-27

cc:

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Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 & 2
Final Report Concerning
Reactor Pressure Vessel Radiographs

I. Summary

Radiographs required by the ASME Code for the reactor pressure vessel (RPV) have been received at the South Texas Project site directly from the RPV manufacturer rather than from Westinghouse as required by the contract between HL&P and Westinghouse. A preliminary review indicated that not all radiographic testing (RT) film was accounted for per the RT reader sheets in the data packages. The missing film has now been accounted for. A film inventory review program has been established by the project to review all Westinghouse originated film.

II. Description of the Deficiency

The 1974 ASME Boiler and Pressure Vessel Code, NA-4910 requires the Owner to be responsible for continued maintenance of records (including final radiographs) for the life of the plant at the power plant site, the Manufacturer's plant or other locations determined by mutual agreement. HL&P's contract with Westinghouse states that Westinghouse or Subcontractors will hold the film as specified in the ASME Code. At a point in time after plant acceptance, as agreed to in the contract, the radiographic film is to be retrieved from storage by Westinghouse and forwarded to HL&P for permanent retention.

HL&P has received radiographs directly from Combustion Engineering for the RPV Closure Head. Reviews of the RT package contents by HL&P for accountability have indicated that four packages of radiographs for the Unit 1 RPV Closure Head were not included. These packages have been located in the manufacturer's facility.

III. Corrective Action

The four previously unaccounted for film packages were located and have been received at the jobsite.

A review program of RT film was established between the project and Westinghouse. A complete accountability review of RT film provided to the project to date by Westinghouse and/or suppliers under Westinghouse contracts was performed. All inconsistencies, open items and deficiencies have been documented and resolutions will be obtained by December 31, 1985.

IV. Recurrence Control

The project will continue the above film inventory review for future Westinghouse originated RT film as it is received at the jobsite. This will initially include complete reviews of each submittal. The extent of subsequent reviews will be established based on the acceptability of the first few submittals.

In the future Westinghouse supplied RT film will be shipped directly to the Westinghouse site office and then transmitted to the project records center via project procedure.

V. Safety Analysis

All film was correctly reviewed and accepted by appropriate personnel prior to identification of this deficiency. Therefore, evidence of the acceptability of RPV documentation was in existence. The project considers this concern to have been a contractual deficiency and does not believe that it constitutes a breakdown in Quality Assurance requirements. Therefore, had this deficiency been left uncorrected, no adverse impact upon safe operation of the plant would have existed. Thus, this item does not meet the reportability criteria of 10CFR50.55(e).