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Senior Vice President & Principal Nuclear Officer

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U. S. Nuclear Regulatory Commission  
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Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSSES) -  
UNIT 2  
DOCKET NO. 50-446  
(1986 EDITION OF ASME CODE, SECTION XI, NO ADDENDA;  
UNIT 2 INTERVAL DATES: AUGUST 3, 1993 - AUGUST 3, 2003,  
FIRST INTERVAL)

This transmittal submits relief request D-1 and E-2 (Attachments 1 and 2 respectively) for your approval. TXU Electric requests approval for Relief Requests by September 31, 2000.

There are no new licensing based commitments in the communication. Should you have additional questions, please contact Obaid Bhatti at 254-897-5839.

Sincerely,

*C. L. Terry*  
C. L. Terry

By: *Roger D. Walker*  
Roger D. Walker  
Regulatory Affairs Manager

OAB/oab

Attachments

cc: E. W. Merschoff, Region IV  
J. I. Tapia, Region IV  
D. H. Jaffe, NRR  
Resident Inspectors, CPSSES  
G. Bynog, TDLR

*AC47/1*

**CPSES UNIT 2  
RELIEF REQUEST  
D-1**

A. Item(s) for which relief is requested:

Component Cooling Water (CCW) System component supports  
Tag No.'s: CC-2-155-408-S53R and CC-2-159-409-S53R

B. Item(s) Code Class:

3

C. Examination requirement from which relief is requested:

The requirement for visual examination of 100% of the weld length as described in Table IWD-2500-1, Examination Category D-A , Item No. D1.20.

D. Basis for relief:

Bolted pipe chase covers prevent access to the integral welded attachments for these two component supports and therefore preclude the visual examination of the weld surface required by Fig. IWD-2500-1. Administrative controls and barriers restrict access to the pipe chases due to high radiation levels. The immediately adjacent component supports of similar type, design and function on the same pipe lines and the remaining 68 integral welded attachments in the CCW system are not covered and are accessible for the required examination. The bolted pipe chase covers will be removed if conditions exist in the accessible areas that could indicate the integrity of the integral welded attachments on the two inaccessible component supports are suspect for continued service.

The extensive craft and radiation protection support for scaffolding, rigging, plate removal and plate reinstallation that would be required if the bolted pipe chase covers for these 2 component supports are removed would not be compensated for by an increase in the level of plant quality and safety.

E. Alternate examinations:

None

F. Anticipated impact on the overall level of plant quality and safety:

None

**CPSES UNIT 2  
RELIEF REQUEST  
E-2**

A. Item(s) for which relief is requested:

Electrical Penetration No.'s:

2-E-0006, 0009, 0015, 0016, 0018, 0039, 0040, 0045, 0056, 0060, and 0066.

B. Item(s) Code Class:

MC

C. Examination requirement from which relief is requested:

The requirement for visual examination of 100% of the containment surface areas as described in Table IWE-2500-1, Examination Category E-A, Item No. E1.11 of the 1998 Edition of ASME Section XI, Subsection IWE per CPSES Relief Request E-1.

D. Basis for relief:

The surfaces of these 11 electrical penetrations are covered with radiant energy shield (RES) material which precludes the general visual examination of the surface required by Table IWE-2500-1, Examination Category E-A, Item No. E1.11. This RES material is designed for post fire safe shutdown protection. RES is made from a custom sewn ceramic fiber blanket in a fireproof fabric envelope which is banded in place and is not designed for removal and reinstallation. The adjacent containment liner surfaces and the remaining 64 electrical penetrations are not covered and are accessible for the required examination. An evaluation of these covered penetrations will be performed and the RES will be removed if conditions exist in accessible areas that could indicate degradation could also exist or could have extended into the RES covered areas.

The extensive craft and radiation protection support for scaffolding, RES material removal, repair or replacement of damaged RES material and RES material reinstallation that would be required if the RES wrapping on these 11 electrical penetrations is removed would not be compensated for by an increase in the level of plant quality and safety.

E. Alternate examinations:

None

F. Anticipated impact on the overall level of plant quality and safety:

None