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Ref. # 10CFR50.55a(g)(5)(iii)

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September 10, 2001

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
UNIT 1 DOCKET NO. 50-445
RELIEF REQUEST E-2 FOR UNIT 1 ELECTRICAL PENETRATION
(1998 EDITION OF ASME CODE, SECTION XI)

This transmittal submits relief request E-2 for your approval. TXU Electric requests approval for this Relief Request by December 17, 2001. Please note that a similar relief request was submitted for CPSES Unit 2 via TXU Electric letter logged TXX-00151 dated August 10, 2000 (TAC NO. MA8706), and was approved via NRC letter dated October 16, 2000.

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

Sincerely,

C. L. Terry

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

OAB/dws

Attachment

cc: E. W. Merschoff, Region IV
J. A. Clark, Region IV
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Resident Inspectors, CPSES
G. Bynog, TDLR

A047

INSERVICE INSPECTION (ISI) RELIEF REQUEST
CPSES UNIT 1 RELIEF REQUEST NO. E-2

I. System/Component for Which Relief is Requested

CPSES Unit 1 Electrical Penetration No.'s:

E-0006, E-0009, E-0015, E-0018, E-0029, E-0039, E-0040, E-0056 and E-0060

II. ASME Code Requirements

ASME Section XI, 1998 Edition, Table IWE-2500-1, Examination Category E-A, Item No. E1.11, requires a general visual inspection of the 100 percent of the accessible containment surface once each inspection period during the interval.

III. Code Requirement from Which Relief is Requested

Pursuant to the requirements 10 CFR 50.55a(g)(5)(iii), relief is requested from performing a general visual examination of the 100 percent of the accessible containment surfaces for the 9 electrical penetrations listed in section I of this relief request.

IV. Basis for Relief

The surfaces of these 9 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 construction of the RES is such that, if damaged, the fibrous material can create excessive waste, and will require additional attention to prevent sump clogging. The metal containment liner surfaces, including all mechanical penetrations and the remaining 66 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. This relief is being requested for 9 electrical penetration which are all of stainless steel construction and represent less than 1 percent of the total IWE metal containment surface area. More than 90 percent of the containment surface area has been examined to date. The previously examined mechanical penetration assemblies and the containment liner are of carbon steel construction and are more susceptible to corrosion type damage mechanisms. No matters of concern with respect to any damage mechanism were identified. TXU Electric has adequate confidence that these stainless steel surfaces are not

INSERVICE INSPECTION (ISI) RELIEF REQUEST
CPSES UNIT 1 RELIEF REQUEST NO. E-2 (continued)

susceptible to the damage mechanisms that may affect the carbon steel surfaces. Therefore, there are no additional safety benefits in examining these penetration surfaces.

A total of 1100 man-hours will be required to perform this activity. The radiation exposure is expected to exceed 3.5 man-Rem. 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 9 electrical penetrations is removed would not be compensated for by an increase in the level of plant quality and safety.

V. Proposed Alternative Examinations

No alternative examination are proposed in lieu of a general visual inspection.

VI. Justification for Granting of Relief

IWE-2500, Table IWE-2500-1, Examination Category E-A Item E1.11 requires a general visual examination of 100 percent of the accessible surface areas be completed once each inspection period during the interval . TXU Electric requests relief from examining the remaining 9 electrical penetrations which are currently covered with a RES material that precludes examination without removal. TXU Electric has examined greater than 90 percent of the accessible containment surfaces, which include electrical and mechanical penetrations, and no significant degradation was identified. Additionally, consistent with site specific corrective action procedures, TXU Electric will remove the RES material and examine the electrical penetrations if conditions exist in accessible areas that indicate degradation may have extended into the RES-covered areas, provides adequate confidence that containment integrity will be maintained. Therefore, there are no additional safety benefits in examining these penetration surfaces.

VII. Implementation Schedule

This relief request will be implemented during the CPSES Unit 1 first interval, first period second outage.