

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER • DALLAS, TEXAS 75201

R. J. GARY  
EXECUTIVE VICE PRESIDENT  
AND GENERAL MANAGER

July 25, 1980  
TXX-3166

Mr. W. C. Seidle, Chief  
Reactor Construction & Engineering  
Support Branch  
U. S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
611 Ryan Plaza Dr., Suite 1000  
Arlington, Texas 76012

Docket Nos. 50-445  
50-446

COMANCHE PEAK STEAM ELECTRIC STATION  
1981-83 2300 MW INSTALLATION  
WELDED CONDUIT SUPPORTS  
FILE NO: 10110

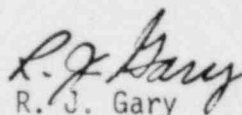
Dear Mr. Seidle:

In accordance with 10 CFR 50.55(e) we are submitting the attached report of actions taken to correct deficiencies relative to the installation and inspection of welded conduit supports. The matter was verbally reported to your Mr. R. G. Taylor on February 29, 1980, and an interim report, TXX-3126, was submitted on April 21, 1980.

Supporting documentation is available at the CPSES site for your inspector's review.

If we can provide any additional information, please advise.

Very truly yours,

  
R. J. Gary

Attachment

RJG:dk

cc: NRC Region IV (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)  
c/o Distribution Services Branch, DDC, ADM.  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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## WELDED CONDUIT SUPPORTS

Description of Deficiency

Monitoring efforts by QA personnel indicated the following two discrepancies in the area of Site-fabricated, welded conduit supports:

- 1) A major support was being fabricated without formalized instructions, procedures or drawings, and thus appropriate control of construction activities could not be directly verified.
- 2) Inspection records for a number of smaller welded supports were not directly traceable to the "as built" conditions and it was not possible to directly verify control of the welding process.

Safety Implications

The identified deficiencies rendered the quality status of the support installations indeterminate. With this condition, design integrity could not be assured under the postulated loading conditions of a seismic event.

Corrective Actions

Corrective actions for the above stated discrepancies have included the following:

- 1) Typical engineering drawings for the major support have been developed and have been included in the conduit support package (2323-S-910) for CPSES. This action was completed on January 24, 1980. Contingency plans provide for the use of formalized instructions

such as the "Construction Operation Traveler" in the event that details other than those included on the typical engineering drawings are required to formally control construction activities.

- 2) The formal inspection instruction QI-QP-11.10-1 entitled, "Inspection of Exposed Conduit Raceway Support Systems," was revised on December 11, 1979. This inspection instruction corrects the record traceability discrepancy for these supports.

While QI-QP-11.10-1 specifically addresses the documentation of conduit raceway supports inspections to the individual support, the welded supports installed prior to December 11, 1979, were inspected per QI-QP-11.3-4, and when acceptable were stasued with a QC "Acceptance Sticker."

These supports are being reinspected under QI-QP-11.10-1 which essentially revalidates the previous inspection and provides inspection documentation to the as-built condition of an individual conduit support. Additionally, verification of the welding process is being handled by a review of the Weld Filler Metal Log (WFML) to verify welder certification.

This reinspection of welded supports is currently underway and is being handled and completed as part of the normal CPSES conduit raceway inspection program. Any unsatisfactory support is processed in accordance with applicable site quality documents covering deficient or nonconforming conditions.