DmB 50.55(e)
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TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

July 29, 1981
TXX-3374

Mr. G. L. Madsen, Chief
Reactor Projects Branch
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Dr., Suite 1000
Arlington, TX 76012

Docket Nos. 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
DIESEL GENERATOR PIPE SUPPORTS
FILE NO: 10110

Dear Mr. Madsen:

In accordance with 10 CFR 50.55(e), we are submitting the attached report of actions taken to correct the identified deficiency regarding the diesel generator pipe supports. We previously made a verbal report to Mr. W. C. Crossman on September 26, 1980 and submitted interim reports logged TXX-3222 and TXX-3268, dated October 21, 1980 and January 12, 1981, respectively.

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

RJG:cp

Attachment

c: NRC Region IV - (0 + 1 copy)

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

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ATTACHMENT
DIESEL GENERATOR [illegible]PE SUPPORTS

DESCRIPTION OF DEFICIENCY

The technical specifications for the CPSES Unit 1 and 2 Diesel Generators imposed the requirements of ASME III Subsection ND for auxiliary piping systems which imposed the requirements of Subsection NF on associated component supports. The effective edition of the Code required stamping of these supports.

The component supports - fabricated by the supplier (Delaval) - were shipped partially assembled on the auxiliary skid base unit fabricated by a subtier vendor (Kaiser Steel). All welds were shop inspected by the supplier in accordance with a shop procedure based upon ANSI B31.1 for visual inspection.

Piping alignment difficulties encountered in the installation of the component supports necessitated the review of supplier/subtier vendor documentation. This review indicated the supplier had manufactured the supports without acknowledging the requirements of Subsection NF.

ANALYSIS OF SAFETY IMPLICATIONS

In a seismic event resulting in the loss of off-site electrical sources, an inadequacy of power necessary to operate plant safety related auxiliaries could result.

CORRECTIVE ACTION

Corrective Action for the deficient condition consists of establishing compliance of the fabrication of the supports to the AISC Code. The design of the supports has been certified by the supplier to be in accordance with the ASME Code.

Two major activities are included in this effort:

1. Weld Inspection - Using an inspection program based upon AWS D1.1, Construction Quality Control personnel will inspect all accessible welds. Unacceptable welds will be evaluated and appropriately dispositioned by Engineering.

2. Supporting Documentation - A package will be compiled by Engineering which will provide acceptable documentation for the component supports. The package will consist of:

   a) Welding Procedures
   b) Welder Qualifications
   c) Material Certifications

Corrective Action including rework as required will be completed prior to fuel delivery to site.