

TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER - DALLAS, TEXAS 75201

Log # TXX-3590

File # 905.4

November 16, 1982

Mr. S. B. Burwell
Licensing Project Manager
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
REACTOR VESSEL PRESERVICE INSPECTION

Dear Mr. Burwell:

Texas Utilities contracted with Westinghouse in 1977 to perform a reactor vessel preservice inspection utilizing a remote inspection tool to be performed in accordance with the 1974 edition of the ASME Code Section XI. Based on the anticipated startup schedule at that time, the inspection would have been conducted well before the implementation of Regulatory Guide 1.150. Construction delays, in part due to changing regulatory requirements, have caused the scheduling of the vessel inspection to fall within the implementation time frame of Reg. Guide 1.150. Our review of the Reg. Guide suggests that although many of the Reg. Guide requirements are not without merit, considerable controversy still exists within the industry as to the extent of implementation.

For the following reasons, it is our intention to perform the reactor vessel inspection in accordance with our existing Westinghouse contract without implementation of Reg. Guide 1.150:

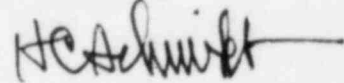
1. Implementation of Reg. Guide 1.150 would result in significant cost increase and require renegotiation of the existing vessel inspection contract.
2. The industry considers some of the Reg. Guide requirements to be controversial and has recommended numerous changes. It is highly likely that these recommendations will be factored into a future revision to the Reg. Guide. It would not be prudent to implement this Reg. Guide in its present form.
3. We consider the Reg. Guide to be staff guidance since it has not as yet been promulgated as a staff regulatory requirement.

Boo1

4. There are plants that will start up after CPSES but have already had their vessel inspection approved without implementation of Reg. Guide 1.150 under provisions of ASME Code Section XI paragraph IWB-2200(b).

It is our intention to perform the reactor vessel inspection in the latter part of the first quarter of 1983. Should you have any questions in this matter please contact me directly.

Sincerely,



H. C. Schmidt

BSD:tls

cc: R. A. Jones
J. T. Merritt
M. R. McBay
J. Johnson
C. Moehlman
J. Keller