TEXAS UTILITIES GENERATING COMPANY
2001 BRYAN TOWER DALLAS, TEXAS 75201-3050

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

April 21, 1983
TXX-3657

Mr. G. L. Madsen, Chief
Reactor Projects Branch 1
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Docket Nos. 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
CONTROL VALVE BRACKETS
FILE NO. 10110
QA FILE: SDAR 108; CP-83-08

Dear Mr. Madsen:

In accordance with 10 CFR 50.55(e), we are submitting the attached report of actions taken to correct a deficiency regarding the welding of brackets on vendor supplied valves. We had previously informed your Mr. R. G. Taylor of the deficiency on March 24, 1983.

Support documentation is available at the CPSES site for your Inspector's review.

Very truly yours,

B R Clements
for R. J. Gary

RJG:lj

IE-27

Attachment

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

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

ATTACHMENT
CONTROL VALVE BRACKETS

Description of Deficiency

TUSI Engineering has evaluated the subject deficiency and identified two items. The first item deals with the issue of the code boundary of the brackets welded to the valve operators. By definition the valve operators are considered an intervening element in the component support load path. The brackets are an integral part of the valve operator supplied by the valve vendor. As such, the NF jurisdictional boundary is the mechanical pin connection to the snubber. The bracket or weld is not considered NF in this case.

The second item deals with the quality of the bracket-to-actuator barrel weld. The code requires that load path be transferred without loss of component pressure boundary integrity. From a design perspective, the brackets are acceptable based upon vendor submitted and approved analytical seismic analyses and generic "shaker table" mechanical testing. These documents are available for review in the Permanent Plant Records Vault. However, from a product perspective, no objective evidence is available documenting acceptable weld quality. The integrity of the welds cannot be assured during a seismic event.

Safety Analyses

In the event the deficiency had not been detected, failure of the bracket welds during a seismic event could result in an unpostulated line break rendering certain class 2 safeguards actuation systems unavailable.

Corrective Actions

The brackets and welds for valves identified per the site nonconformance report will be discarded and replaced. Note: With the work completed in accordance with the project ASME QA program, the weld and brackets will no longer be considered "intervening elements" outside the NF boundary. Corrective actions will proceed immediately.