

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)	Docket Nos. 50-445-OL
)	50-446-OL
TEXAS UTILITIES ELECTRIC)	
COMPANY, <i>ET AL.</i>)	
)	Docket No. 50-445-CPA
(Comanche Peak Steam Electric)	
Station, Units 1 and 2))	

AFFIDAVIT OF ROBERT M. LATTA REGARDING
NONCONFORMANCE REPORT E-84-0079, REVISION 1

Robert M. Latta, first being duly sworn, deposes and states:

1. My name is Robert M. Latta. I am employed by the U.S. Nuclear Regulatory Commission as Resident Inspector assigned to Comanche Peak Steam Electric Station, Unit 2, in the Division of Reactor Projects, Section B, NRC Region IV. A statement of my professional qualifications is attached hereto as Attachment 1.
2. The purpose of my affidavit is to describe the issues associated with Nonconformance Report (NCR) E-84-0079, Revision 1.
3. This NCR involved the grooming of an electrical conduit to provide the 1" minimum separation for conduit to conduit configurations, which was specified in the governing Installation Specification 2323-ES-100, Appendix F, titled "Electrical Installation." Specifically, a section of nonvital electrical conduit associated with an emergency lighting system was adjusted (approximately 1/16") by an electrical engineer in order to establish the specified minimum clearance between it and an adjacent

nonsafety-related electrical conduit. The circumstances associated with the movement of the nonvital electrical conduit by an electrical engineer and the impact of this activity on installed nonsafety-related electrical equipment were addressed in the technical resolution of the subject NCR. This condition, which was dispositioned by Texas Utilities (Licensee) as "use-as-is," was attributed to a misinterpretation of the electrical separation criteria. Furthermore, it was stated on the NCR that the integrity of the electrical conduit was not impacted by this activity.

4. Based on my review of this NCR and field inspections of the affected nonsafety-related lighting systems, I determined that Licensee had appropriately addressed the technical aspects of this condition. No adverse impacts to installed nonsafety-related lighting systems/components resulted from this occurrence, and these events did not involve programmatic deficiencies which could have affected public health and safety.

5. The issues associated with this NCR never posed a safety concern in that the affected lighting system is not safety-related nor was credit taken for this lighting system in the Licensee's Appendix R Safe Shutdown Program.

6. The matters stated above are true and correct to the best of my knowledge, information and belief.


Robert M. Latta

Subscribed and sworn to before
me this 27 day of March, 1992


Notary Public

My commission expires: 3/16/93

