

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
SEISMIC RESTRAINT COMPRESSION FITTING CRIMPS

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 a 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 what Seismic Restraint Compression Fitting Crimps are, their purpose, and why the alleged deficiencies noted in the eight Nonconformance Reports (NCRs) did not pose a threat to the public health and safety.


3. Seismic restraint compression fittings are utilized throughout Units 1 and 2 to secure wire braided lanyards, which restrain nonsafety-related equipment (i.e., lighting fixtures, lighting power supplies, etc.) from potentially interacting with safety-related equipment during a postulated seismic event. Specifically, stainless steel "aircraft" cable (nominally 1/16" or 1/8" diameter) is installed through equipment supports and is looped

on either end through an alloy compression fitting which is crimped with a swaging tool. The aircraft cable, which is cut to length and crimped at the compression fittings, serves as a passive restraint to restrict the movement of suspended/attached lighting fixtures. The requirements associated with the fabrication, installation, and inspection of these assemblies are defined in Gibbs and Hill Drawings 2323-E2-1704-0, 1704-2, and 1704-2; Design Basis Document DSD-EE-047, Revision 0, "Lighting Systems"; and Reg Guide 1.29, "Seismic Design Classification."

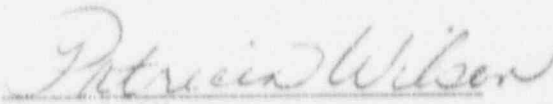
4. I have reviewed the eight NCRs relating to seismic restraint compression fittings and the Licensee's disposition of those NCRs. The deficiencies identified on the subject NCRs involved nonconforming conditions on numerous seismic restraint compression fittings. The acceptability of these compression fittings was determined by the use of measuring devices (go-no-go gauge) in order to establish if the fittings were properly crimped. As identified in these NCRs, several of these gauges were determined to exceed the maximum allowable widths, thus the acceptability of the examined compression fittings was indeterminate. In response to these identified deficiencies, the Licensee performed testing of a representative sample of compression fittings which corresponded to the worst case conditions for both the 1/16" and 1/8" fittings. The test results demonstrated that the cables failed before the fittings which were the subject of these NCRs failed. Engineering evaluations of the test results were used by the Licensee as the basis for accepting the installed configurations.

5. The deficiencies noted in the eight NCRs are not a safety concern based on the reviews of the test results, which confirmed the adequacy of the installed seismic restraint compression fittings. It was determined that the licensee adequately addressed the identified deficiencies.

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 27th day of March, 1992


Notary Public



My commission expires: 3/16/93