Log # TXX-3663 TEXAS UTILITIES SERVICES INC. File # 905.4 2001 BRYAN TOWER-DALLAS, TEXAS 75201-3050 May 6, 1983 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 PRESERVICE INSPECTION PLAN UPDATE Dear Mr. Burwell: Enclosed please find three (3) copies of relief request D-3 and F-1 which are to be included as part of the previously transmitted CPSES Preservice Inspection Plan. Copies of these relief request are also being sent to the CPSES resident inspector and Tom Taylor at Battelle Pacific Northwest Laboratories. Should you have any questions concerning this matter, please contact me directly. BSD:tls Enclosure c - Robert Taylor Tom Taylor Hool III Add: NSIC MTEB 8406130186 840506 PDR ADOCK 0500044

### RELIEF REQUEST D-3

Component: Integral Attachments Code Class: 3

Examination Requirements: Table IWD-2500-1

Items D1.20 thru D1.60 . . . . . VT-3 Visual Items D2.20 thru D2.60 . . . . . VT-3 Visual Items D3.20 thru D3.60 . . . . . VT-3 Visual

## Basis for Relief:

Various pre-startup tests and inspections performed on integral attachments to a great extent duplicate the visual inspection requirement of the preservice inspection.

## Alternative Examination:

Documentation provided for Manufacturers' inspection, Quality Assurance installation verification, preoperational test inspections and system functionability verification will be used in lieu of the IWD VT-3 visual inspection requirements.

### RELIEF REQUEST F-1

Component: Component Supports Code Class: 1, 2 and 3

Examination Requirements: IWF-2200 and Table IWF-2500-2

#### IWF-2200 Preservice Examination

- a) All examinations listed in Table IWF-2500-2 shall be performed completely, once, as a preservice examination.
- b) All examinations shall be performed following the initiation of hot functional tests.

# Basis for Relief:

Installation verification inspections to a great extent duplicate the inspection requirements of IWF. Performance of inspection after initiation of hot functional testing requires the removal and re-installation of large amounts of insulation which causes significant cost and schedule impacts.

# Alternative Examination:

Documentation provided for Quality Assurance installation verification, preoperational test inspections and system functionability verification will be used in lieu of IWF component support inspections.