UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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| In the Matter of | ) | |
| | ) | |
| TEXAS UTILITIES ELECTRIC COMPANY, et al. | ) | Docket Nos. 50-445<br>50-446 |
| | ) | |
| (Comanche Peak Steam Electric Station, Units 1 and 2) | ) | (Application for Operating License) |

APPLICANTS' STATEMENT OF MATERIAL FACTS
REGARDING MAXIMUM ROUGHNESS SURFACE PREPARATION ISSUE
AS TO WHICH THERE IS NO GENUINE ISSUE

1. Applicants prepare steel substrate surfaces for the application of primer coatings by sandblasting, power tooling, and hand sanding. None of these methods of surface preparation should produce a maximum surface profile in excess of 3 mils. Applicants utilize a blast medium, coarse sand, that limits the surface profile of sandblasted steel substrate, and Applicants' quality procedures ensure that primer applied to steel surfaces completely covers the profile. On this basis, the manufacturer of the primer coatings used on steel surfaces at Comanche Peak has approved Applicants' steel surface preparation procedures, so far as the procedures do not specify a maximum allowable surface height.

2. Applicants' construction procedure governing the profile height of steel substrate surfaces prepared for primer coatings is consistent with the standards of Steel Structures Painting Council Surface Preparation

Specifications No. 10, Near-White Blast Cleaning, with the requirements of Applicants' Specification AS-31, and with the recommendations of the manufacturer of the primer coatings used by Applicants to coat steel substrate surfaces.