

Log # TXX-92052  
 File # 10110  
 903.9  
 Ref. # 10CFR50.55(e)

**TU**ELECTRIC

February 19, 1992

**William J. Cahill, Jr.**  
 Group Vice President

U. S. Nuclear Regulatory Commission  
 Attn: Document Control Desk  
 Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
 DOCKET NOS. 50-445 AND 50-446  
 IMPROPER APPLICATION OF CONSTRUCTION AIDS  
 SDAR: CP-87-59 (SUPPLEMENTAL REPORT)

Gentlemen:

On September 21, 1987 in letter logged TXX-6750, TU Electric notified you of a deficiency involving improper application of construction aids which we deemed reportable under the provisions of 10CFR50.55(e). This report is submitted to describe the Unit 2 corrective actions for resolving this deficiency and to clarify the Unit 1 corrective actions and associated documentation.

As described in TXX-6750, this issue involved the permanent installation of cable tray fittings (T1W and T-11W) that were intended by the vendor to be used only as temporary fittings to aid in tray alignment during construction. TXX-6750 indicated that Nonconformance Reports (NCRs) would be generated to document each instance these fittings were utilized and the fittings replaced with field fabricated fittings through Design Change Authorizations (DCAs) or other approved CPSES program documents.

The CPSES deficiency document utilized to resolve the deficiency was Corrective Action Request (CAR) 87-031. The use of a CAR eliminated the need for utilizing individual NCRs. This CAR directed the performance of Field Verification Method (FVM)-19 by engineering to identify and document each instance that T1W and T-11W fittings were utilized in the field for Unit 1 and Unit 2. Resolution for deficiencies in Unit 1 involved fitting replacement, field modification of the fitting, or analysis to demonstrate that structural integrity was maintained using the fitting as-is. A DCA was issued for Unit 1 that reflects the location and configuration of each remaining T1W or T-11W fitting. As discussed in TXX-6750, the secondary issue of cable tray rung spacing was resolved during evaluation of the tray fittings.

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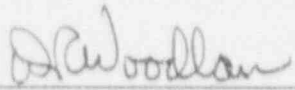
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For Unit 2 this deficiency will be resolved in the same manner. The location of the fittings is documented by rvm-19. Fittings that have been evaluated by Engineering and found to be acceptable as-is will be documented with a DCA to the installation specifications. Modification of the fittings, where required, will be performed with a DCA. This will include an evaluation for rung spacing deficiencies as was done in Unit 1.

The corrective actions for Unit 2 will complete prior to Unit 2 fuel load.

Sincerely,

William J. Cahill, Jr.

By:   
D. R. Woodlan  
Docket Licensing Manager

JAA/tg

c - Mr. R. D. Martin, Region IV  
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