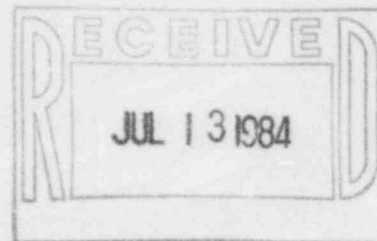


**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

Log # TXX-4223  
File # 10010  
917.3 clo

July 13, 1984

Mr. John T. Collins  
Regional Administrator, IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76102



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
PROPOSED AMENDMENT TO FSAR TABLE 17A-1

REF: (1) 10CFR50.55(f)(3)

Dear Sir:

Attachment (1) is a change to Table 17A-1 of the CPSES FSAR. This change is being submitted to satisfy the requirements of reference (1). The change clarifies how leak tests are being performed on instrument tubing between the instrument isolation valves and the instruments. This change was discussed with and found acceptable by MEB and QAB of NRR as described in attachment (2) (TCO-565 of May 1, 1984). The sheets of primary interest from Table 17A-1 of the CPSES FSAR are included in attachment (3). Sheet 47 is the only sheet being revised. Approval to make this change was received from your staff and is documented by attachment (4). Although this change appears in Chapter 17 of the CPSES FSAR, the change relates to specific testing requirements and does not revise the CPSES quality assurance program.

Respectfully,

*J S Marshall*  
J. S. Marshall

DRW:grr  
Attachment

cc - J. Cummins  
D. Hunnicutt  
Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

8407240023 840713  
PDR ADDCK 05000445  
A PDR

12-07  
||

Attachment 1

COMANCHE PEAK STEAM ELECTRIC STATION  
FSAR CHANGE REQUEST

Referenced Section of FSAR: Table 17A-1

Description of Change:

A change to footnote 41. Add these words, "The leak testing of the instrument tubing between the instrument isolation valve and the instrument will be accomplished by completion of normal instrument calibration."

References:

Justification:

To properly document the method being used at CPSES to perform the leak tests for these short runs of tubing, as opposed to the exact requirement of the ASME Code, Section III.

Organization Originating Request: I & C Engineering

Originator:

Date:

*Jimmy W. G. H.*  
5/8/84

Approval Recommended by:

Date:

*C. H. Creamer* 5/11/84

Approval Recommended by:

Date:

TUSI: Request No. 84-59 *DRW*

Recommend-Approval

Disapproval

By:

*D. R. Wood*

Date:

6-28-84

Approved

Not Approved

By:

*J. H.*

Date:

7/5/84

Change Provided in Amendment 50

TEXAS UTILITIES GENERATING COMPANY  
CONFERENCE MEMORANDUM

Log # TCO-565  
File # 917.3

DATE May 1, 1984  
TIME 10:00 a.m.

RECORDED BY: D. R. Woodlan *DRW*

ORIGINATED BY:  
D. R. Woodlan

RECEIVED BY:  
John Stefano  
J. R. N. Rajan  
John Sprau?

SUBJECT COMANCHE PEAK STEAM ELECTRIC STATION  
Hydrostatic Testing of Instrument Tubing Between Instrument  
and the Instrument Isolation Valve

SUMMARY I called John Stefano and asked to speak with our MEB reviewer. John got Mr. Rajan on the line and I explained that we were making a change to the CPSES FSAR to better explain how we were leak testing a portion of our instrument tubing. I wanted to explain this change ahead of time so that the staff would not be confused or feel undue concern.

The change concerns the short run of tubing (usually 18" to 2') between the instrument isolation valve and the instrument. It has been our intent to leak test this short section of tubing by completion of normal instrument calibration. The leak test would thus be documented by the record that normal calibration had been completed. Our QA pointed out, however, that this procedure is acceptable but does not meet the letter of the code (ASME Section III) and the FSAR says that the code applies to this tubing (with certain specific exceptions).

In order to resolve this inconsistency, we plan to add a sentence to footnote 41 of Table 17A-1 of the CPSES FSAR. This sentence will read, "The leak testing of the instrument tubing between the instrument isolation valve and the instrument will be accomplished by completion of normal instrument calibration." We feel this is technically adequate and our QA feels that the sentence will adequately document this deviation from the specific requirement of the code.

(cont'd)

FOLLOW-UP ACTION \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DISTRIBUTION JBG, JSM, HCS, JTM, RDC, RAJ, JCK, John Stefano, Gayle Creamer

TCO-565 continued

Mr. Rajan and I discussed the change to ensure that he had a full understanding of our meaning and intent. Mr. Rajan found our approach and the change acceptable.

John Stefano said that we should check with the Quality Assurance Branch also so he got John Spraul on the line. I went through the same explanation again and a similar discussion ensued. John's conclusion was that the change was also acceptable to him if acceptable to MEB.

JPW

CPSES/FSAR  
TABLE 17A-1  
(SHEET 1 of 50)

LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

System and Components	Safety Class (7)	Applicable		Seismic Category	Quality Assurance	Reference Section	Remarks
		Code or Standard (12)	Code Class				
<u>1. Reactor Coolant System (RCS)</u>							
Reactor vessel	1	ASME III	1	I	Note 3,A	5.3	Note 13a
CRDM housings	1	ASME III	1	I	Note 6,A		Note 13a
CRDM head adapter plugs	1	ASME III	1	I	Note 4,A		Note 13a
Reactor vessel supports	1	ASME III	1	I	Note 3,A	5.4.14	Note 13a
Steam generator							
Tube side	1	ASME III	1	I	Note 6,A	5.4.2	Note 13a
Shell side	2	ASME III	1	I	Note 6,A		Note 8, 13a
Steam generators supports	1	ASME III	1	I	Note 6,A	5.4.14	Note 13a
Steam generator restraints	1	ASME III	1	I	Note 3,A		Note 13a
Pressurizer	1	ASME III	1	I	Note 6,A	5.4.10	Note 1b, 13a
Pressurizer support skirt	1	ASME III	1	I	Note 3,A	5.4.14	Note 13a
Reactor coolant hot- and cold-leg piping & fittings, and fabrication	1	ASME III	1	I	Note 3,A	5.4.3	Note 13a
Surge pipe & fittings and fabrication	1	ASME III	1	I	Note 3,A	5.4.10	Note 13a
Piping & valves	2	ASME III	2	I	Note 26,A		Note 13a
Crossover leg piping & fittings and fabrication	1	ASME III	1	I	Note 3,A	5.4.3	Note 13a
Pressurizer safety valves	1	ASME III	1	I	Note 3,A	5.4.13	Note 13a
Power-operated relief valves	1	ASME III	1	I	Note 3,A	5.4.13	Note 13a
Check Valves for PORV Accumulators	3	ASME III	3	I	Note 32,A	R312.32	Note 13c, 13d
Tubing and Supports (between check valves upstream of air accumulator and AOV)	3	-	-	I	Note 32,A	3.9B	Notes 13c, 13h, 41
Pressurizer PORV Block Valves	1	ASME III	1	I	Note 3,A	5.4.12	Note 13c
PORV and Safety Valves Limit Switches	1E	IEEE-323	-	I	Note 3,A	11.D.3	Note 13d
Valves of Safety Class 1 to Safety Class 2 interface	1	ASME III	1	I	Note 3,A	5.4.12	Note 13a
High Point vent valves	2	ASME III	2	I	Note 3,A	5.1	Note 13d
Pressurizer relief tank	NNS	ASME VIII	-	NONE	Note 4, 2B	5.4.11	Note 13g

Attachment 3

CPSES/FSAR  
TABLE 17A-1  
SHEET 11  
LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

System and Components	Safety Class (7)	Applicable Code or Standard (12)	Code Class	Seismic Category	Quality Assurance	Reference Section	Remarks
Supports for Class 3 piping	3	ASME III	3	I	Note 27,A	3.9B	Note 13c
Supports for Class 5 piping	NNS	ANSI B31.1	-	II	Note 44,B	3.7B	Note 13e
<u>12. Main Steam, Reheat and Steam Pump System</u>							
Main steam piping	2	ASME III	2	I	Note 26,A	10.3	Note 13
Piping, valves, and drain pots	2	ASME III	2	I	Note 26,A	10.3	Note 13a
Piping, valves, and drain pots	3	ASME III	3	I	Note 26,A	10.3	Note 13a
Main steam safety valves	2	ASME III	2	I	Note 26,A	10.3	Note 13c and 13d
Main steam relief valves	2	ASME III	2	I	Note 26,A	10.3	Note 13d
Steam generator PORV air accumulator	3	ASME III	3	I	Note 26	P212.32	Note 13c
Turbine driven auxiliary feedwater pump steam supply isolation valve accumulator tanks	3	ASME III	3	I	Note 26,A	10.3	Note 13c
Check valves for accumulator tanks	3	ASME III	3	I	Note 32,A	10.3	Note 13c, 13d
Tubing and supports (between check valves upstream of air accumulator and AOV)	3	-	-	I	Note 32,A	3.9B	Notes 13c, 13h, 41
Steam generator blowdown system piping	2	ASME III	2	I	Note 26,A	10.3	Note 13
Steam flow restrictor (integral to steam generator)	2	ASME III	2	I	Note 4,A	10.3, 5.4.4	Note 13a
Main steam isolation valves	2	ASME III	1	I	Note 26,A	10.3	Note 8, 13c and 13d
Main steam isolation bypass valves and bypass valve piping	2	ASME III	1	I	Note 26,A	10.3	Note 8, 13c and 13d
Reflective insulation assemblies	NNS	Mfrs Stds	-	II	Note 27,B	6.2.2	Note 13d
Piping and valves	2	ASME III	2	I	Note 26,A	10.3	Note 13c
Piping and valves	3	ASME III	3	I	Note 26,A	10.3	Note 13c
Piping and valves (Class 5)	NNS	ANSI B31.1	-	II	Note 34B,B		Note 13g

CPS/FSAR

TABLE 17A-1

SHEET 12

LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

System and Components	Safety Class (7)	Applicable Code or Standard (12)	Code Class	Seismic Category	Quality Assurance	Reference Section	Remarks
Orifices	3	ASME III	3	I	Note 26,A	10.3	Note 13c
Supports for Class 2 Piping	2	ASME III	2	I	Note 27,A	3.9B	Note 13c
Supports for Class 3 Piping	3	ASME III	3	I	Note 27,A	3.9B	Note 13c
Supports for Class 5 Piping	NNS	ANSI B31.1	-	II	Note 44,B	3.7B	Note 13a, 13e
<u>13. Auxiliary Feedwater System</u>							
Motor-driven auxiliary feedwater pumps	3	ASME III	3	I	Note 26,A	10.4.9	Note 1a, 13c
Turbine-driven auxiliary feedwater pump	3	ASME III	3	I	Note 26,A	10.4.9	Note 1e, 13c
Auxiliary feedwater pump turbine driver and associated equipment	3	Mfrs Stds	-	I	Note 26,A	10.4.9, 10.3	Note 13c and 13d
Piping and valves	2	ASME III	2	I	Note 26,A	10.4.9	Note 13a
Piping and valves	3	ASME III	3	I	Note 26,A	10.4.9	Note 13a
Air accumulators (AFW Control Valves)	3	ASME III	3	I	Note 26,A	9.3.1	Note 13c
Check valves for accumulators	3	ASME III	3	I	Note 32,A	9.3.1	Note 13c, 13d
Tubing and supports (between check valves upstream of accumulator and AOV)	3	-	-	I	Note 32,A	9.3.1	Note 13c, 13h, 41
Supports for Class 2 piping	2	ASME III	2	I	Note 27,A	3.9B	Note 13c
Supports for Class 3 Piping	3	ASME III	3	I	Note 27,A	3.9B	Note 13c
Supports for Class 5 piping	NNS	ANSI B31.1	-	II	Note 44,B	3.7B	Note 13a, 13e
Condensate storage tank	3	ACI 318-71	-	I	Note 32,A	3.8.4, 10.4.9	Note 13a, 55
<u>14. Steam Generator Feedwater System</u>							
Piping and valves	2	ASME III	2	I	Note 26,A	10.4.7	Note 13a
Feedwater isolation valves	2	ASME III	2	I	Note 26,A	10.4.7	Note 13c
Orifices	2	ASME III	2	I	Note 26,A	10.4.7	Note 13c
Reflective insulation assemblies	NNS	Mfrs Stds	-	II	Note 27,B	6.2.2	Note 13d
Supports for Class 2 Piping	2	ASME III	2	I	Note 26,A	3.9B	Note 13c
Supports for Class 5 Piping	NNS	ANSI B31.1	-	II	Note 44,B	3.7B	Note 13a, 13e

CPSES/FSAR

TABLE 17A-1

SHEET 36

LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

System and Components	Safety Class (7)	Applicable		Seismic Category	Quality Assurance	Reference Section	Remarks	
		Code or Standard (12)	Code Class					
supports for Class 2 piping	2	ASME III	2	I	Note 27,A	3.9B	Note 13	42
supports for Class 5 piping	NNS	ANSI B31.1	-	II	Note 44,B	3.7B	Note 13e	
b) Hydrogen system								
piping and valves	2	ASME III	2	I	Note 26,A	3.9B	Note 13	
supports for Class 2 piping	2	ASME III	2	I	Note 27,A	3.7B	Note 13e	
supports for Class 5 piping	NNS	ANSI B31.1	-	II	Note 44,B	3.6B	Note 13e	
<u>41. Instrumentation and Control</u>								
Electronic transmitters (pressure and differential pressure)	1E	IEEE-323	-	I	Note 26,3,A	7.0	Note 13d	42
Electronic transmitters (flow)	1E	IEEE-323	-	I	Note 26,3,A	7.0	Note 13d	
Pressure switches	1E	IEEE-323	-	I	Note 26,A	7.0	Note 13d, 39	
Level Switches	2,3	ASME III	2,3	I	Note 26,A	7.0	Pressure integrity only Note 13d	
Level Transmitters	1E	IEEE-323	0	I	Note 26,A	7.0	Functional Integrity only Note 13d	42
Thermowells	NNS	Mfrs Stds	-	I	Note 26,A	7.0	Pressure Integrity only Note 13c, 13d	
Resistance Temperature Detectors	1E	IEEE-323	-	I	Note 26,A	7.0	Note 13d	
Source and Intermediate Range Neutron	1E	IEEE-323	-	I	Note 3,A	7.2	Note 13d	
Power Range neutron detectors	1E	IEEE-323	-	I	Note 3,A	7.2	Note 13d	
Thermowells (RWMS)	NNS	ANSI B31.1	-	-	Note 34B		Note 13g	42
Flow elements (RWMS)	NNS	ANSI B31.1	-	-	Note 34B, 34N		Note 13g	
Containment hydrogen analyzers	1E	IEEE-323	-	I	Note 26,A	7.5	Note 13d	
Differential Pressure Switches	1E	IEEE-323	-	I	Note 26,A	7.0	Note 13d	



CPS/FSAR

TABLE 17A-1

SHEET 37

LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

System and Components	Safety Class (7)	Applicable		Seismic Category	Quality Assurance	Reference Section	Remarks
		Code or Standard (12)	Code Class				
Rotameters	3	ASME III	3	I	Note 26,4, 34N,A	7.0	Pressure Integrity only   46 Note 13e
Rotameters	NNS	Mfrs Stds	-	II	Note 34N	11.3	Note 13g
Orifice Plates (Flow Metering)	2,3	Mfrs Stds	-	I	Note 26,A	7.0	Note 13e
Chlorine detectors (control room intake)	N/A	Mfrs Stds	-	I	Note 26,A	9.4	Note 13d
I & C impulse tubing, fittings and valves	2,3	ASME III	2,3	I	Note 32,A	7.0	Note 41, 13c, 13d
I & C impulse tubing, fittings, valves and supports	2,3	-	-	I	Note 32,A	7.0	Note 13c, 13d,   42
I & C supports for impulse tubing, fittings and valves	NNS	-	-	II	Note 32,A	7.0	Note 13c, 13d, 51
Instrument supports (seismic Category I instruments)	N/A	-	-	I	Note 32,A	7.0	Note 13c, 38
Nuclear instrument racks (NIS)	N/A	IEEE-344	-	I	Note 3,A	7.0	Note 13d
Process instrumentation and control racks (NSSS)	N/A	IEEE-344	-	I	Note 4,A	7.0	Note 13d
Rod control equipment	N/A	-	-	NONE	Note 4	7.0	Note 13g
Rod position indication containment cabinets	N/A	-	-	NONE	Note 4	7.0	Note 13g
I&C Power supply inverters (NSSS)	1E	IEEE-323	-	I	Note 3,A	7.0	Note 13d
Solid-state protection system cabinet	1E	IEEE-323	-	I	Note 3,A	7.0	Note 13d
Control board demultiplexer	N/A	-	-	NONE	Note 4	7.0	
Hot shutdown panel	N/A	IEEE-344	-	I	Note 26,A	7.0	Note 13c, 13d
Process instrumentation protection racks	N/A	IEEE-344	-	I	Note 3,A	7.0	Note 13d

CPSSES/FSAR  
TABLE 17A-1  
SHEET 47

LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

36. The applicable code for the Containment is the proposed Standard Code for Concrete Reactor Vessels and Containment (April 1973) issued for trial use and comments. It was developed by the Joint ACI-ASME Technical Committee on Concrete Pressure Components for Nuclear Service (see Section 3.8.1.2.1).
37. Deleted
38. This also applies to NNS instruments which are connected to piping or ducting with seismic Category I or II tubing and supports.
39. All pressure switches are differential pressure switches with the low side open to atmosphere.
40. Deleted
41. Impulse tubing, valves, and fittings are supported as seismic Category I, but do not comply with ASME III, subsection NF. Therefore, this ASME material will not have Third Part Inspection, Code Stamping, and Code Data reports as specified in ASME subsection NA 5000 and NA 8000. Site fabrication and installation of this ASME material will be in accordance with NRC approved QA program governing non-ASME work which meets the requirements of Appendix B to 10 CFR Part 50 (ASME III subsection NA 4000 excluded).
42. The quality assurance requirements of Appendix A of the Branch Technical Position APCSB 9.5-1 of Standard Review Plan, Section 9.5.1, Revision 1, are satisfied.
43. The quality assurance requirements of Branch Technical Position MEB 3-1 and APCSB 3-1 are satisfied.

41

41

30

The leak Testing of the instrument tubing between the instrument isolation valve and the instrument will be accomplished by completion of normal instrument calibration.

FEBRUARY 10, 1984

Attachment 4

TEXAS UTILITIES GENERATING COMPANY  
CONFERENCE MEMORANDUM

Log # TCO-568  
File # 917.3  
837

DATE June 28, 1984  
TIME 1:33 p.m.

RECORDED BY: D. R. Woodlan  
D. R. Woodlan

ORIGINATED BY:  
D. R. Woodlan

RECEIVED BY:  
D. M. Hunnicutt  
NRC, Region IV

SUBJECT COMANCHE PEAK STEAM ELECTRIC STATION  
CHANGES TO CHAPTER 17 OF FSAR

SUMMARY I called Mr. Hunnicutt to get NRC Region IV approval to make two  
changes to Table 17A-1 of the CPSES FSAR (a change request on the leak testing  
of instrument tubing and a clarification on the safety classification of cable  
trays and their supports).

I asked who I should speak to for approval to changes to Chapter 17 of the  
CPSES FSAR. I explained that I had two fairly minor changes to the table in  
Chapter 17. I also explained that we previously obtained such approvals from  
Dan Fox but understood that he had changed positions.

Mr. Hunnicutt told me to go ahead and make the changes on his authority and that  
he would get back to me in the next several days with the name of our new  
contact for these matters.

FOLLOW-UP ACTION \_\_\_\_\_

DISTRIBUTION JSM, D. M. Hunnicutt, SLS

CPSSES/FSAR

TABLE 17A-1

SHEET 22

LIST OF QUALITY ASSURED STRUCTURES, SYSTEMS AND COMPONENTS

System and Components	Safety Class (7)	Applicable Code or Standard (12)	Code Class	Seismic Category	Quality Assurance	Reference Section	Remarks
HVAC panels (control room)	1E	IEEE-323	-	I	Note 26,A	9.4	Note 13c, 13d
<u>23. Control Room Air-Conditioning System</u>							
Air-conditioning units							
a. Roughing filter, fan, heating and direct-expansion refrigerant type coils	3	Mfrs Stds	-	I	Note 26,A	9.4.1	Note 21, 13c
b. Refrigerant piping & tubes	3	ASME B42 & B88	-	I	Note 26,A	9.4.1	Note 21, 13c
c. Water side	3	ASME III	3	I	Note 26,A	9.4.1	Note 13c
Fans	3	Mfrs Stds	-	I	Note 26,A	9.4.1	Note 13c
Emergency pressurization and filtration units (roughing, charcoal, and HEPA filters and fans)	3	Mfrs Stds	-	I	Note 26,A	9.4.1	Note 21, 13c
Piping and valves	3	ASME III	3	I	Note 26,A	9.4.1	Note 13a
Dampers and supports	3	Mfrs Stds	-	I	Note 26,32,A	9.4.1	Note 21
Ductwork and supports	3	Mfrs Stds	-	I	Note 26,32,A	9.4.1	Note 21, 13c, 13d
Air Accumulators (intake dampers)	3	ASME III	3	I	Note 26,A	9.3.1	Note 13c
Tubing and supports (between check valves upstream of accumulators and intake dampers)	3	-	-	I	Note 26,A	9.3.1	Note 13c, 13h, 41
Check valves for accumulators	3	ASME III	3	I	Note 32,A	9.3.1	Note 13c, 13d
HVAC panels (control room)	1E	IEEE-323	-	I	Note 26,A	9.4	Note 13c, 13d