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

Log # TXX-4290
File # 905.4

August 29, 1984

Mr. B. J. Youngblood, Chief
Division of Licensing
Licensing Branch No. 1
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBEJCT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
PRESERVICE INSPECTION PLAN UPDATE

Dear Mr. Youngblood:

Enclosed are three (3) copies of new relief requests C-5 and C-6, and revised relief requests B-8 and B-10. These relief requests contain the information required by NRC Question 121.13. Copies of these relief requests are also being sent to the CPSES resident inspector and Tom Taylor at Battelle Northwest Laboratories.

Should you have any questions, please contact me directly.

Sincerely,

J. S. Marshall for
H. C. Schmidt

BSD:tls
Enclosures

c - J. J. Stefano
J. A. Cummins
T. Taylor

B001
1/1

RELIEF REQUEST B-8

Component: Pressurizer B5.20
Steam Generators B5.30

CODE CLASS: 1

Examination Requirement:

Table IWB-2500-1 Category B-F requires a volumetric and surface examination of the nozzle to safe end welds, including 1/3 wall thickness for volumetric examination.

Basis for Relief:

The geometric configuration of the nozzle prevents ultrasonic examination from being performed on the base metal on the nozzle side of the weld to the extent required by Figure IWB-2500-8 for all welds listed in Table B-8.

Alternative Examination:

One hundred percent of the weld volume up to 1/3T and the required amount of base metal on the pipe side of the weld will be examined. The base metal on the nozzle side of the weld will be examined to the extent practical. Surface examinations will be performed on essentially 100% of the required area. Also see Table B-8.

TABLE B-8

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Steam Generators B-F

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4100	Loop 1 RC	4DM	Pipe to nozzle	90%	Metallurgy obstruction, weld contour @ toe, nozzle taper	RT, PT
TBX-1-4200	Loop 2 RC	4DM	Pipe to nozzle	85%	Metallurgy obstruction, nozzle taper, weld crown	RT, PT
TBX-1-4200	Loop 2 RC	5DM	Pipe to nozzle	85%	Metallurgy obstruction, nozzle taper, weld crown	RT, PT
TBX-1-4300	Loop 3 RC	4DM	Pipe to nozzle	85%	Metallurgy obstruction, nozzle taper, weld crown	RT, PT
TBX-1-4300	Loop 3 RC	5DM	Pipe to nozzle	85%	Metallurgy obstruction, nozzle taper, weld crown	RT, PT
TBX-1-4400	Loop 4 RC	4DM	Pipe to nozzle	95%	Metallurgy obstruction, nozzle taper, rough surface, weld crown	RT, PT
TBX-1-4400	Loop 4 RC	5DM	Pipe to nozzle	95%	Metallurgy obstruction, nozzle taper, weld crown, rough surface	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE B-8

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Pressurizer B-F

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4501	Pressurizer Safety	1DM	Nozzle to safe-end	90%	Nozzle restriction	RT, PT
TBX-1-4501	Pressurizer Safety	12DM	Nozzle to safe-end	90%	Nozzle restriction	RT, PT
TBX-1-4502	Safety Relief	1DM	Nozzle to safe-end	90%	Nozzle restriction	RT, PT
TBX-1-4503	Pressurizer Safety Spray	31DM	Nozzle to safe-end	75%	Nozzle restriction	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

RELIEF REQUEST B-10

Component: Piping Systems CODE CLASS: 1

Examination Requirement:

Table IWB-2500-1 Category B-J requires volumetric examination of branch pipe connection welds exceeding 2 inches diameter.

Basis for Relief:

The configuration of the pipe branch connections prevents meaningful volumetric examination of the entire weld and heat affected zone for welds listed in Table B-10. Practical alternative techniques to volumetrically examining the entire areas of these welds which would produce meaningful results are not presently available.

Alternative Examination:

A volumetric examination will be performed on butt welded branch connections only. A surface examination will be performed as required. Also see Table B-10.

TABLE B-10

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping B-J

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4100	Loop 1 RC	2	Pipe to pipe	60%	Metallurgy obstruction, adjacent weld, weld contour	RT, PT
TBX-1-4100	Loop 1 RC	13	Pipe to pipe	50%	Metallurgy obstruction, elbow taper, adjacent weld, weld contour	RT, PT
TBX-1-4100	Loop 1 RC	21BC	Branch connection	50%	Metallurgy obstruction 4" nozzle 1" from weld	RT, PT
TBX-1-4101	RHR Take-off	7	Valve to pipe	80%	Valve body restriction	RT, PT
TBX-1-4101	RHR Take-off	8	Valve to pipe	80%	Valve body restriction	RT, PT
TBX-1-4101	RHR Take-off	13	Valve to pipe	80%	Valve body restriction	RT, PT
TBX-1-4102	Accumulator Discharge	2	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4102	Accumulator Discharge	5	Pipe to elbow	*	Welded name plate	RT, PT
TBX-1-4102	Accumulator Discharge	6	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4102	Accumulator Discharge	7	Pipe to valve	*	Weld toe, pipe to valve	RT, PT
TBX-1-4102	Accumulator Discharge	8	Pipe to valve	*	Weld toe, pipe to valve	RT, PT
TBX-1-4102	Accumulator Discharge	9	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4102	Accumulator Discharge	10	Pipe to elbow	*	Weld toe	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE B-10
SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping B-J

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4102	Accumulator Discharge	11	Pipe to tee	*	Weld toe	RT, PT
TBX-1-4104	SIS	1BC	Branch connection	70%	Branch connection collar	RT, PT
TBX-1-4104	SIS	3	Pipe to elbow	80%	Weld crown, weld toe	RT, PT
TBX-1-4104	SIS	4	Pipe to elbow	85%	Weld crown, weld toe	RT, PT
TBX-1-4104	SIS	5	Pipe to elbow	85%	Weld crown, weld toe	RT, PT
TBX-1-4200	Loop 2 RC	2	Pipe to pipe	60%	Metallurgy obstruction, adjacent weld contour, weld crown	RT, PT
TBX-1-4200	Loop 2 RC	19BC	Branch connection	70%	Metallurgy obstruction, weld crown	RT, PT
TBX-1-4200	Loop 2 RC	11	Pipe ot nozzle	95%	Metallurgy obstruction, weld crown	RT, PT
TBX-1-4200	Loop 2 RC	13	Pipe to pipe	50%	Weld crown, elbow taper, adjacent weld, weld contour	RT, PT
TBX-1-4201	Accumulator Discharge	2	Pipe to elbow	*	Weld buildup, weld toe	RT, PT
TBX-1-4201	Accumulator Discharge	5	Pipe to elbow	*	Welded nameplate, weld toe	RT, PT
TBX-1-4201	Accumulator Discharge	6	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4201	Accumulator Discharge	7	Pipe to valve	*	Weld toe	RT, PT
TBX-1-4201	Accumulator Discharge	8	Pipe to valve	*	Weld toe	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE B-10

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping B-J

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4201	Accumulator Discharge	11	Pipe to tee	*	Weld toe	RT, PT
TBX-1-4202	SIS	5	Pipe to elbow	90%	Elbow	RT, PT
TBX-1-4202	SIS	12	Pipe to tee	85%	"T" connection	RT, PT
TBX-1-4300	Loop 3 RC	2	Pipe to pipe	60%	Metallurgy obstruction, adjacent weld contour, weld crown	RT, PT
TBX-1-4300	Loop 3 RC	13	Pipe to pipe	50%	Metallurgy obstruction, adjacent weld contour, weld crown	RT, PT
TBX-1-4300	Loop 3 RC	11	Pipe to nozzle	95%	Metallurgy obstruction, nozzle tape, weld crown	RT, PT
TBX-1-4300	Loop 3 RC	19BC	Branch connection	70%	Metallurgy obstruction, weld crown	RT, PT
TBX-1-4301	Accumulator Discharge	2	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4301	Accumulator Discharge	5	Pipe to elbow	*	Welded nameplate, weld toe	RT, PT
TBX-1-4301	Accumulator Discharge	6	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4301	Accumulator Discharge	8	Pipe to valve	*	Valve to pipe	RT, PT
TBX-1-4301	Accumulator Discharge	9	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4301	Accumulator Discharge	10	Pipe to elbow	*	Weld toe	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE B-10
SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping B-J

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4301	Accumulator Discharge	11	Pipe to tee	*	Weld toe	RT, PT
TBX-1-4301	Accumulator Discharge	7	Pipe to valve	60%	Valve restriction	RT, PT
TBX-1-4400	Loop 4 RC	2	Pipe to pipe	60%	Metallurgy obstruction, adjacent weld, weld contour	RT, PT
TBX-1-4400	Loop 4 RC	13	Pipe to pipe	50%	Metallurgy obstruction, adjacent weld, weld contour	RT, PT
TBX-1-4400	Loop 4 RC	22BC	Branch connection	60%	Metallurgy obstruction, 4" nozzle 3/4" from weld	RT, PT
TBX-1-4401	RHR Take-off	6	Pipe to valve	75%	Weld crown, valve body	RT, PT
TBX-1-4401	RHR Take-off	7	Pipe to valve	75%	Weld crown	RT, PT
TBX-1-4401	RHR Take-off	12	Pipe to valve	75%	Weld crown, valve body	RT, PT
TBX-1-4402	Accumulator Discharge	2	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4402	Accumulator Discharge	5	Pipe to elbow	*	Welded nameplate, weld toe	RT, PT
TBX-1-4402	Accumulator Discharge	6	Pipe to elbow	*	Weld toe	RT, PT
TBX-1-4402	Accumulator Discharge	7	Pipe to valve	*	Weld toe	RT, PT
TBX-1-4402	Accumulator Discharge	8	Pipe to valve	*	Weld toe	RT, PT
TBX-1-4402	Accumulator Discharge	10	Pipe to elbow	*	Weld toe	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE B-10
SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping B-J

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4402	Accumulator Discharge	11	Pipe to tee	*	Weld toe	RT, PT
TBX-1-4403	SIS	7	Pipe to elbow	90%	Hanger restriction	RT, PT
TBX-1-4501	Pressurizer Safety	22	Pipe to nozzle	90%	Nozzle restriction	RT, PT
TBX-1-4502	Safety Relief	8	Pipe to elbow	95%	Weld crown, elbow restriction	RT, PT
TBX-1-4503	Pressurizer Spray	11	Pipe to reducer	90%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	12	Pipe to pipe	80%	Weld crown	RT, PT
TBX-1-4503	Pressurizer Spray	13	Pipe to pipe	80%	Weld crown	RT, PT
TBX-1-4503	Pressurizer Spray	14	Pipe to reducer	90%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	25	Pipe to reducer	90%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	18	Pipe to valve	80%	Valve restriction	RT, PT
TBX-1-4503	Pressurizer Spray	21	Pipe to reducer	80%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	15	Pipe to reducer	85%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	26	Pipe to reducer	85%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	30	Pipe to nozzle	80%	Nozzle restriction	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE B-10

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping B-J

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-1-4503	Pressurizer Spray	19	Pipe to valve	80%	Valve restriction	RT, PT
TBX-1-4503	Pressurizer Spray	22	Pipe to reducer	85%	Reducer restriction	RT, PT
TBX-1-4503	Pressurizer Spray	23	Pipe to tee	80%	Tee restriction	RT, PT
TBX-1-4503	Pressurizer Spray	24	Pipe to tee	80%	Tee restriction	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

RELIEF REQUEST C-5

Component: Piping Systems CODE CLASS: 2

Examination Requirements:

Table IWC-2520 Category CF requires volumetric examination of 100% of the subject pipe welds.

Basis for Relief:

The configuration of the pipe connection welds prevents meaningful examination of the entire volume required to be inspected for welds listed in Table C-5.

Alternative Examination

See Table C-5.

TABLE C-5

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping C-F

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-2-2100	Main Steam	1	Pipe to nozzle	95%	Nozzle restriction	RT, MT
TBX-2-2100	Main Steam	26	Pipe to cap	95%	Pipe cap restriction	RT, MT
TBX-2-2100	Main Steam	37	Branch connection to flange	12%	Configuration restriction, weld crown	RT, MT
TBX-2-2101	Feedwater	17	Pipe to valve	98%	Valve restrictions	RT, MT
TBX-2-2200	Main Steam	25	Pipe to cap	95%	Pipe cap restriction	RT, MT
TBX-2-2200	Main Steam	32	Branch connection to flange	37%	Configuration restriction, weld crown	RT, MT
TBX-2-2201	Feedwater	32	Pipe to valve	95%	Valve restriction	RT, MT
TBX-2-2300	Main Steam	35	Pipe to cap	95%	Pipe cap restriction	RT, MT
TBX-2-2301	Feedwater	28	Pipe to valve	50%	Valve restriction	RT, MT
TBX-2-2400	Main Steam	1	Pipe to nozzle	95%	Nozzle restriction	RT, MT
TBX-2-2401	Feedwater	15	Pipe to valve	98%	Valve restriction	RT, MT
TBX-2-2500	RHR	1	Pipe to valve	80%	Valve restriction	RT, PT
TBX-2-2523	Accumulator Discharge	7	Pipe to valve	96%	Valve restriction weld crown	RT, PT
TBX-2-2534	Safety Injection	8	Pipe to tee	90%	Tee restriction, weld toe, weld crown	RT, PT
TBX-2-2561	HP SIS	36	Pipe to elbow	90%	Elbow restriction, weld crown	RT, PT
TBX-2-2564	HP SIS	40	Pipe to tee	80%	Weld crown	RT, PT
TBX-2-2566	HP SIS	2	Pipe to elbow	90%	Elbow restriction, weld crown	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

TABLE C-5

SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Piping C-F

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-2-2566	HP SIS	3	Pipe to elbow	90%	Elbow restriction weld crown	RT, PT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.

RELIEF REQUEST C-6

Component: Vessels CODE CLASS: 2

Examination Requirement:

Table IWC-2500-1 Category C-A requires 100% volumetric examination of the pressure retaining vessel welds.

Basis for Relief:

Geometric restrictions prevent meaningful examination of 100% of the required inspection volume for welds listed in Table C-6.

Alternate Examinations:

See Table C-6.

TABLE C-6
SUMMARY OF PARTIAL VOLUMETRIC EXAMINATIONS

CATEGORY: Vessels C-A

SKETCH NO.	SYSTEM	WELD NO.	PHYSICAL CONFIGURATION	% EXAM	REASON FOR PARTIAL	OTHER EXAM **
TBX-2-1110	Excess Letdown Heat Exchanger	1	Head to flange	50%	Nozzle restrictions, flange restrictions	RT
TBX-2-1110	Excess Letdown Heat Exchanger	2	Flange to shell	95%	Flange restrictions, drain line, weld crown	RT
TBX-2-1120	Residual Heat Exchanger	1	Head to torus	79%	Welded support	RT
TBX-2-1120	Residual Heat Exchanger	2	Torus to flange	58%	Welded support, flange restriction	RT
TBX-2-1120	Residual Heat Exchanger	3	Pipe to torus	95%	Pipe weld restriction	RT, PT
TBX-2-1120	Residual Heat Exchanger	4	Pipe to torus	95%	Pipe weld restriction	RT, PT
TBX-2-1140	Letdown Heat Exchanger	1	Head to flange	80%	Flange restrictions	RT
TBX-2-1150	Regenerative Heat Exchanger	3	Vessel Girth	98%	Weld crown, tee restriction	RT
TBX-2-1150	Regenerative Heat Exchanger	4	Vessel Girth	98%	Weld crown, tee restriction	RT
TBX-2-1150	Regenerative Heat Exchanger	5	Vessel Girth	92%	Weld crown, reducer restriction	RT
TBX-2-1150	Regenerative Heat Exchanger	6	Vessel Girth	92%	Weld crown, reducer restriction	RT
TBX-2-1150	Regenerative Heat Exchanger	7	Vessel to nozzle	78%	Weld crown, nozzle restriction	RT
TBX-2-1150	Regenerative Heat Exchanger	8	Vessel to nozzle	78%	Weld crown, nozzle restriction	RT

* PAR - % Examination not recorded, this is one of 30 welds examined to 74 Code.
** MT and PT examination per Section XI and RT examination per Section III.