

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

JOE B. GEORGE
VICE PRESIDENT

November 16, 1984

Mr. S. B. Burwell
Licensing Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

50-445

SUBJECT: Comments on Cygna's Response to NRC Questions
Comanche Peak Steam Electric Station
Independent Assessment Program - Phases 1 and 2
Texas Utilities Generating Company
Job No. 83090

REF: Cygna Letter Number 83090.021 dated 11/6/84

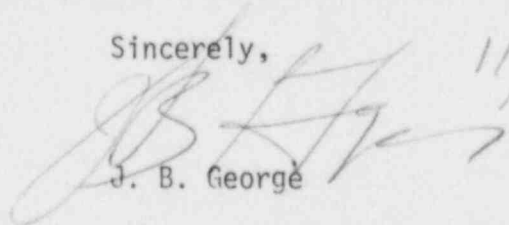
Dear Mr. Burwell:

In Cygna's response to NRC Question 1, "Is it appropriate for hardware to be installed in a manner different from that shown on the design drawing if this is allowed by a procedure?", it was stated that a design drawing was modified without a design change or nonconformance report (NCR). Specifically, snubbers were reversed 180° from the design drawing orientation.

TUGCO disagrees that the reversal of snubbers is a design change. The orientation of snubbers shown on design drawings is purely arbitrary. This was confirmed in a meeting on July 14 & 15, 1982 at CPSES with representatives of Pacific Scientific and NPSI. The meeting was attended by representatives of construction, QC and engineering and all parties were jointly informed that orientation is arbitrary.

If you have any questions or concerns, please advise.

Sincerely,


J. B. George

11/16/84

JBG:JV:pew

cc: Ms. N. Williams
Mr. D. Pigott
Mr. S. Treby
Mrs. J. Ellis

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see Attached

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PDR ADOCK 05000445
A PDR