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 IR 91-202, 91-201  
 Ref. # 10CFR2.201

**TU ELECTRIC**

July 10, 1992

William J. Cahill, Jr.  
 Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
 DOCKET NOS. 50-445 AND 50-446  
 NRC INSPECTION REPORT NOS. 50-445/91-202; 50-446/91-201  
 RESPONSE TO DEFICIENCY AND UNRESOLVED ITEMS

- REF: 1) TU Electric Letter logged TXX-92143 from William J. Cahill, Jr.  
 to the NRC dated March 27, 1992
- 2) TU Electric Letter logged TXX-92202 from William J. Cahill, Jr.  
 to the NRC dated April 30, 1992

Gentlemen:

TU Electric has reviewed the NRC's letter dated January 27, 1992, concerning the Configuration Management Inspection (CMI) conducted by the NRC staff from November 18 through December 13, 1991. This inspection covered activities authorized by the NRC operating license NPF-87 and construction permit CPPR-127. Our last letter was logged TXX-92202 dated April 30, 1992. The purpose of this letter is to clarify discussions between CPSES and NRC personnel which were held during the CMI. Specifically, during those discussions CPSES provided an explanation of the program for cable tray attribute verification of hangers and splice plates.

Subsequently, NRC Inspection Report 445/91-202; 446/91-201 explained the program as follows:

Paragraph 3.7.6.4

The licensee further explained that a program was under development to address cable tray attribute verification of hangers and splice plates, via a specific cable tray walkdown program performed during room/area turnover".

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TU Electric provides the following clarification regarding verification of cable tray hangers and splice plates. A specific program to walkdown all cable trays to verify attributes pertaining to hangers and splice plates has not been developed, nor, was it intended to be. As part of the room/area completion process, which does include scheduled walkdowns, each discipline identifies and documents equipment which require additional work, including loose and damaged equipment. These walkdowns would include the identification of cable tray hangers and splice plates which require additional work. In addition, the turnover process was preceded by engineering assessments of cable trays, controlled fabrication and Quality Control or Construction Engineer verifications.

TU Electric believes that these processes provide adequate assurance that cable trays are properly installed and that cable tray hanger and splice plate attributes are properly inspected and maintained.

Sincerely,

  
William J. Cahill, Jr.

By:   
Roger D. Walker  
Manager of Regulatory Affairs  
for NEO

RHS/ds

c - Mr. J. L. Milhoan, Region IV  
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