10-1-81

In Reply Refer To: Docket: 50-445/84-16

Texas Utilities Electric Company ATTN: M. D. Spence, President, TUGCO Skyway Tower 400 North Olive Street Lock Box 81 Dallas, Texas 75201

Gentlemen:

This refers to the special inspection of the Unit 1 reactor containment building conducted by Mr. L. E. Martin and other members of our staff during the period May 14 through June 20, 1984, of activities authorized by NRC Construction Permit CPPR-126 for the Comanche Peak Facility, Unit 1, and to the discussion of our findings with Messrs. J. T. Merritt and A. Vega and other members of your staff at the conclusion of the inspection.

This inspection is the third in a series of planned construction completion room/area inspections. The primary purpose of this inspection was to evaluate the actual as-built status of the reactor containment building as compared to the design and inspection documentation. This inspection covered certain construction characteristics, such as, workmanship, welding, pipe supports, inspection adequacy, etc., which have been the subject of contentions during the ASLB hearing. As you are aware, the Comanche Peak Technical Review Team has a separate effort ongoing to review technical issues and allegations related to these same characteristics for this and other safety-related areas of the plant. As a consequence, this inspection should not be construed to represent the complete or final findings of the as-built status of the containment building.

Areas examined during the inspection included piping and pipe supports, containment penetrations, HVAC ducts and supports, electrical raceway and supports, safety-related equipment, "as-built" program, QC inspector and welder qualifications, and followup on one unresolved item from the special inspection of the fuel building. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews and discussions with craft and QC personnel, and observations by the inspectors. The findings are documented in the enclosed inspection report.

During this inspection, it was found that certain of your activities were in violation of NRC requirements. Consequently, you are required to respond to these violations, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of

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Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

Your response to Item A of the attached Notice of Violation should address the adequacy of inspection of these cable tray hangers (CTHs). It is recognized that the as-built conditions of these hangers are adequate for the intended design function and that the engineering analysis indicates that all of these hangers will be used as they are installed with the exception of CTH 6567 (bevelled washer). Therefore, your response to this violation should address the corrective action and recurrence controls for the inspection of these cable tray hangers.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter, and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the paperwork reduction act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

R. L. Bangart, Director

Region IV Comanche Peak Task Force

Richard L. Bangart

Enclosures:

1. Appendix A - Notice of Violation

2. Appendix B - NRC Inspection Report 50-445/84-16

cc w/enclosures:

Texas Utilities Electric Company
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Texas Utilities Electric Company
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T. Westerman