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William G. Counsil  
Executive Vice President

January 29, 1988

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSTRUMENT TUBE RESTRAINTS AND SUPPORTS  
SDAR: CP-88-24 (FINAL REPORT)

Gentlemen:

On January 22, 1988, we verbally notified your Mr. H. S. Phillips of a deficiency involving instrument tube restraints and supports. We have concluded this issue is reportable under the provisions of 10CFR50.55(e). The required information follows.

DESCRIPTION

During third party inspections, the following conditions involving instrument tube restraints and supports were observed which do not conform to the requirements of the design documents.

- a. Improper clamp types have been installed. Specifically, three-directional clamps have been used in cases where two-directional clamps were specified by the design.
- b. A clamp required by the design was not installed.
- c. Mismatched clamp halves were installed in some cases.
- d. In non-Unistrut installations, the improper installation of three-directional clamps has resulted in loose assemblies to the extent that unintended sliding of the instrument tubing occurred.

Our subsequent review of these conditions has revealed that the finding noted in item b. has been previously evaluated to be an isolated occurrence and of no safety significance. The cause of these conditions has been attributed to inadequate design and installation criteria resulting in inadequate construction and inspection practices. These conditions could extend to all instrument tube support installations.

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SAFETY IMPLICATIONS

Failure of instrument tube supports and restraints could cause failure of instrument tubing installations and adversely impact the operation of safety-related instrumentation. These deficiencies if left uncorrected, could have adversely affected safe plant operations.

CORRECTIVE ACTION

Applicable installation documents and design drawings have been revised to clearly identify clamp configurations and torque values for all typical supports. In addition, Construction and Quality Control personnel have been retrained to ensure complete and accurate implementation of the design requirements for future installation of instrument tube supports and restraints.

Instrument tube supports and restraints are currently being inspected per Field Verification Method (FVM) CPE-SWEC-FVM-IC-069, "Safety/Non-Safety Related Instrumentation and Tubing Connected to ASME III Fluid Systems and ANSI Safety Class Installations," and FVM CPE-SWEC-FVM-EE/ME/IC/CS-0086, "Post Construction Hardware Validation Program (PCHVP) Construction/Quality Control Reverifications." Necessary repair or component replacement will be conducted in accordance with FVM CPE-SWEC-FVM-IC-069 and FVM CPE-SWEC-FVM-EE/ME/IC/CS-0086 requirements.

The Unit 1 completion schedule for this activity will be commensurate with the PCHVP anticipated completion by August 11, 1988. Unit 2 activities will be conducted in accordance with the general construction schedule.

Very truly yours,

*W. G. Council*

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By: *D. R. Woodlan*

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