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August 2, 1988

William G. Council
Executive Vice President

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
ENGINEERING CONTRACTOR AND COMANCHE PEAK
ENGINEERING (CPE) RESPONSIBILITIES AND
ORGANIZATIONAL STRUCTURE

Gentlemen:

As we have previously informed the NRC staff verbally, a change has been made in the structure of the SWEC organizations performing engineering functions as part of the Corrective Action Program (CAP) and, in the near future, all the engineering functions being performed by engineering contractors will be consolidated into an integrated organization managed by SWEC. In addition, most non-safety related production engineering responsibilities have been transferred from CAP engineering contractors to TU Electric Comanche Peak Engineering (CPE). Given the advanced stage of completion of the CAP for Unit 1 and Common, these changes will facilitate completion of Unit 1 and will best provide engineering support for Unit 1 as an operating reactor. This letter summarizes these changes in engineering responsibilities and organizational structure.

As described in the Project Status Reports (PSRs) and TU Electric correspondence to the NRC, the engineering contractors originally responsible for performing the CAP for Unit 1 and Common were SWEC-PSAS, SWEC-CAP, Ebasco and Impell. CPE was responsible for oversight and coordination of the engineering contractor activities as well as for maintenance of the CPE design control procedures and monitoring of engineering contractors to assure that their safety-related engineering and design activities are performed in accordance with these design control procedures.

Earlier this year, SWEC-PSAS and SWEC-CAP were consolidated into a single SWEC organization, in view of the limited remaining effort to be completed within these SWEC disciplines. The consolidated SWEC organization continues to operate under the same engineering procedures and to utilize the assigned SWEC personnel.

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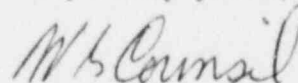
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During the third quarter of 1988, TU Electric intends to achieve a further consolidation of the CAP engineering contractors. SWEC, Ebasco and Impell will retain their respective engineering responsibilities under CAP. However, they will become part of an integrated functional organization managed by SWEC for TU Electric. SWEC's management function will include responsibility for managing all inter-contractor technical interfaces and for engineering schedule, cost and production support activities. All CAP engineering and design functions will continue to be performed utilizing existing procedures and QA programs. Thus, this consolidation will not affect in any way TU Electric's commitments as to technical procedures and methods, corrective and preventive actions or QA programs identified in the PSRs and correspondence to the NRC.

CPE will be responsible for overall design control. SWEC's assumption of responsibility for routine management of the technical interfaces and safety-related engineering production activities will enable CPE to devote more of its resources to preparation for engineering support of Unit 1 operation. In addition, CPE has assumed from the engineering contractors responsibility for most of the non-safety related engineering and design, excluding primarily Fire Protection, systems containing both safety related and non-safety related classifications and most Seismic Category II supports for systems, structures and components.

Please contact me if any additional information is required concerning these changes in responsibilities and organization.

Very truly yours,



W. G. Council

JEK/grr

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)