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May 10, 1988

William G. Counsil Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION

BOCKET NOS. 50-445 AND 50-446

CABLE TRAY SPLICES/CONNECTIONS AND
FIELD DRILLED CABLE TRAY HOLES

SDAR: CP-86-52 (INTERIM REPORT)

CP-87-76 (SUPPLEMENTAL REPORT)

## Gentlemen:

On April 29, 1987, by our letter logged TXX-6415, and on September 25, 1987, by our letter logged TXX-6763, we notified you of reportable deficiencies involving cable tray splice/connections and field drilled cable tray holes in Units 1 and 2. The purpose of this report is to status the corrective actions relative to these issues pursuant to the provisions of 10CFR50.55(e).

The electrical construction procedures ECP-10, Rev. 9 for Unit 1 and ECP-10A, Rev. 3 for Unit 2 have been issued.

With regard to misdrilled/unused holes in cable trays (previously identified in SDAR CP-87-76), the existing criteria per DCA 25066, Rev. 4 has been incorporated in specification ES-100 and applicable construction and inspection procedures.

Under the Post Construction Hardware Validation Program (PCHVP), data is being gathered per FVM-CS-048 for tray splice connections and for unused holes in trays. Based upon these data, alternate criteria are being developed to evaluate tray acceptability. These criteria will establish minimum load rated configurations. Specification ES-100 will be updated to reflect not only the standard vendor configuration but also the minimum load rated configuration. All tray spans will be evaluated to determine their acceptability against the requirements of ES-100. Locations where the tray design loads are not acceptable per the alternate criteria (i.e. reduced allowables) will be inspected and where necessary, the hardware will be changed to assure compliance with the standard vendor configurations.

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Walkdown, criteria development, evaluations, inspections, and identification of required design changes if any, for Unit 1 and Common area will be completed in accordance with the schedule established in the Post Construction Hardware Validation Program (PCHVP) by August 1, 1988. Hardware changes of trays or of splice plates that do not meet the minimum requirements will be completed by December 1, 1988. Modification of Unit 2 splice plates will be complete prior to Unit 2 fuel load.

Isolated cases of Burndy-Husky tray types have been identified on Unit 1, as well as Unit 2. The testing of the Burndy-Husky splice connections is tentatively scheduled for May 25, 1988. As stated in our previous report, TXX-6699, after the tests are completed, an evaluation of the test results will be required to determine if any additional corrective action is necessary. This evaluation activity is scheduled for completion by August 1, 1988.

The results of the Burndy-Husky testing will be discussed in our next report which will be submitted no later than September 16, 1988.

Very truly yours,

W. G. Counsil

RSB/grr

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