



Log # TXX-88676
File # 10110
903.9
Ref. # 10CFR50.55(e)

William G. Council
Executive Vice President

September 9, 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
CONTROL VALVE BRACKETS
SDAR: CP-83-08 (SUPPLEMENTAL REPORT)

Gentlemen:

On April 23, 1983, we provided notification via our report logged TXX-3657 of a deficiency which we considered to be reportable involving ASME documentation for welded brackets on valves supplied by Fisher Controls. In our latest report (logged TXX-88526 dated June 22, 1988) we stated that the brackets that were in use as snubber attachment points on safety related Fisher Control valves would be replaced in order to improve the quality of bracket welds. We also stated that an as-built inspection of the welds had been performed using Nuclear Construction Issues Group Visual Weld Acceptance Criteria (VWAC), and that based on the inspection results, a worst case analysis had demonstrated that the welds would not have failed during a seismic event. Based on the results of this analysis, we concluded that the condition described in SDAR CP-83-08 was not reportable pursuant 10CFR50.55(e).

In discussions subsequent to issuance of TXX-88526, NRC inspectors expressed concern that the presence of protective coatings on the subject welds may have masked significant structural defects during the VWAC inspections. To address these concerns, TU Electric removed the protective weld coatings on selected worst case (based on the anticipated load and previous inspection results) valve brackets, re-inspected the welds using AWS D.1.1 criteria, and re-analyzed the bracket welds. TU Electric also conducted a load test on a bracket that had been welded over raised lettering on the valve actuator casting.

8809140277 880907
PDR ADOCK 05000445
S PNU

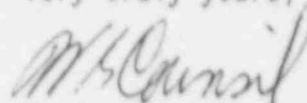
IE27
1/0

TXX-88676
September 9, 1988
Page 2 of 2

The analysis and load test results indicate that the subject brackets would have performed their intended function during a postulated seismic event. NRC inspectors' concerns, regarding details of the analysis, have been addressed and resolved with the inspectors. Records of the analysis and test results are available for the NRC inspectors' review. TU Electric considers that these results substantiate our previously stated position that the condition described in SDAR CP-83-08 is not reportable per 10CFR50.55(e).

Currently, replacement of the Unit 1 valve brackets is scheduled for completion by December 16, 1988. Replacement of the Unit 2 brackets is scheduled for completion prior to Unit 2 fuel load. Not all brackets attached to these valves are in use. As part of the replacement activities, the unused brackets will be removed to prevent future use.

Very truly yours,


W. G. Council

JCH/grr

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