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September 14, 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 FUNCTIONAL EVALUATION

REF: Letter (TXX-6676) dated September 8, 1987 from W. G. Council to NRC  
regarding the Technical Audit Program and Engineering Functional  
Evaluation

Gentlemen:

In our September 8, 1987, letter, in addition to describing the Technical Audit Program (TAP) undertaken by the TU Electric Quality Assurance Department, we advised you of the Stone & Webster Engineering Corporation (SWEC) Engineering Functional Evaluation (EFE) which was underway. The purpose of this letter is to inform you of the completion status of the primary portion of the EFE (i.e., the evaluation of the CPSES design completion activities) and to request the NRC Staff's approval of the integration of the other planned EFE efforts into CPSES Project activities.

As you know, the EFE was one of the programs undertaken to provide added levels of confidence that the Corrective Action Program (CAP) was being conducted effectively. As discussed in TXX-6676, the primary purpose of the EFE was to provide oversight of design validation activities. Module 1 was developed to accomplish that principal EFE objective by providing an independent evaluation of the adequacy of the CPSES design validation and Post Construction Hardware Validation Program activities. The Module 1 effort has been essentially completed and SWEC intends to issue a detailed report in October 1988 summarizing the results of its Module 1 effort.

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As discussed in TXX-6676, in addition to its primary purpose, the EFE was also structured to address the utilization of design data during testing, the utilization of design data during maintenance and operations, and the control of design activities during operations. Those matters are the subjects of EFE Modules 2, 3, and 4, respectively. Those same matters are also subject to the oversight of the TU Electric Quality Assurance Department. As is the case with the EFE, the TU Electric oversight efforts are conducted by individuals who are highly qualified and experienced in the areas they oversee.

The TU Electric QA Department oversight efforts had not been fully defined at the time the EFE was formulated; however, our present assessment of the scope and depth of those oversight efforts has led us to conclude that continuation of the EFE through completion of Modules 2, 3, and 4 would result in unnecessary duplication of effort. Therefore, we are proposing to integrate the planned Modules 2, 3, and 4 activities into CPSES Project activities in a manner that will enable TU Electric to discharge its oversight responsibilities while assuring that the EFE objectives for Modules 2, 3, and 4 are met. The objectives of EFE Modules 2, 3, and 4 will be met by TU Electric as follows:

- o The EFE has provided to the TU Electric Quality Assurance Department the EFE review plans for Modules 2 and 3. The TU Electric Quality Assurance Department will implement those review plans and will supplement them, if necessary, to confirm that design data are properly utilized during testing, maintenance, and operations.
- o The EFE has provided to the TU Electric Quality Assurance Department and Engineering Assurance Section the EFE review criteria for Module 4. The TU Electric Engineering Assurance Section will complete and consider these review criteria during the preparation of procedures for overall site integration of the design control program for operations. The TU Electric Engineering Assurance Section will also correlate CPSES procedures and generic design control issues identified by the CPRT and any NRC operating plant industry concerns to assure these issues are addressed in the design control program for operations. The TU Electric Quality Assurance Department will conduct the planned EFE implementation evaluation of the program and procedures.

Although reports similar to proposed EFE reports of the TU Electric directed activities described above will not be developed, the activities will be fully documented and the documentation retained in CPSES files.

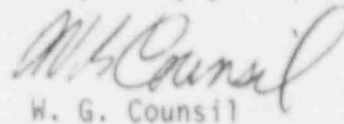
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The NRC letter dated January 22, 1988, approved the CPRT and CAP plans, as described in a number of TU Electric's submittals, including TXX-6676. The letter stated that "any future changes to these plans that would affect the basis for this approval, as described in the enclosed evaluation, must be approved by the NRC before implementation." Although TU Electric does not believe that this change in EFE implementation affects the basis for acceptability of the CAP, in order to assure that the NRC fully concurs in our programs relating to CAP we hereby request your approval of the proposed method of assuring the effective development and implementation of the program and procedures associated with Modules 2, 3, and 4 of the EFE.

In accordance with paragraph A.3 of the Joint Stipulation of July 1, 1988, we are providing CASE a copy of this letter today.

If you desire any additional information concerning the EFE, please contact me.

Very truly yours,

  
W. G. Council

JCH/grr

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