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TUELECTRIC

September 23, 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 NO. 50-445
COATING REMOVAL FROM STATION SERVICE WATER
SYSTEM PIPING

Gentlemen:

TU Electric has been involved in a program to address corrosion concerns relating to the Station Service Water System (SSWS) at the Comanche Peak Steam Electric Station (CPSES). A portion of that program involved removing the internal coating from specific sections of the SSWS piping.

The coating removal activities were discussed in Inspection Reports 50-445/88-34; 50-446/88-30 dated June 17, 1988; 50-445/88-40; 50-446/88-36 dated July 15, 1988; 50-445/88-47 and 50-446/88-42 dated September 2, 1988, and in a management meeting on September 13, 1988. In the meeting, TU Electric discussed coating removal activities including various concerns encountered, both administrative and technical. The TU Electric presentation was based upon reviews which have been on-going and an engineering report which was under development.

During the meeting, TU Electric committed to complete and submit this engineering report by September 23, 1988. Subsequent to the meeting, an NRC representative requested a chronology of the events related to the coating removal effort. This chronology has been prepared and incorporated into the engineering report. The engineering report is enclosed with this letter.

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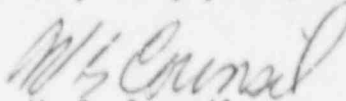
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As a result of this review, TU Electric has identified several actions which are being implemented. These actions include corrective actions as well as enhancement to assure that concerns are corrected and that similar concerns do not recur. These actions are described in the enclosed report and actions are scheduled to be completed on or before December 1, 1988.

Since TU Electric recognizes that identification of root causes and contributing factors can be a subjective process, there are two points that it believes should be emphasized. First, labeling one concern as a root cause and others as contributing factors did not lead to the latter receiving any less attention. Such concerns were carefully evaluated for potential generic implications, and corrective and preventive actions were developed to preclude recurrence. Secondly, TU Electric scrutinized the concerns that were identified in the entire coating removal project, from the problem characterization phase to the evaluation of damage to the pipe. Consequently, all concerns have been fully and appropriately addressed.

Very truly yours,


W. G. Council

MCP/grr
Enclosure

c - Mr. R. D. Martin, Region IV
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