

In Reply Refer To:  
Dockets: 50-445/86-26  
50-446/86-22

MAY 27 1988

TU Electric  
ATTN: W. G. Council  
Executive Vice President  
400 North Olive Street, Lock Box 81  
Dallas, Texas 75201

Gentlemen:

Thank you for your letters of December 31, 1987, and May 16, 1988, modifying your earlier response to our letter and Notice of Violation dated April 2, 1987. We provided an acceptance of the original corrective actions you proposed in your July 13, 1987, letter (TXX-6562) in our letter dated October 29, 1987. Your original commitment to remove all pulling aids (i.e. pull ropes, fishtape, etc.) was revised in your December 31, 1987, letter to leave pull ropes in "conduits" subject to certain restrictions and to write a nonconformance report (NCR) for those metal fishtapes which could not be feasibly removed from "raceways."

Our tacit approval of those changes was based on your further commitment to perform walkdowns as part of the Post Construction Hardware Validation Program (PCHVP) to identify the existence of pulling aids that had been abandoned in raceways. Your May 16, 1988, letter further modified the committed corrective actions to remove the requirement for those walkdowns. This weakening of your commitment jeopardizes the effectiveness of your corrective actions.

We, therefore, require further information to determine if your proposed corrective actions remain acceptable. Specifically, the following questions should be addressed:

1. How are abandoned pulling aids (ropes and fishtape) to be identified in both Units and what is the extent of this problem?
2. Do the revised criteria for abandoning pull ropes in conduits contained in the Electrical Erection Specification (ES-100) also apply to cable trays, or are all pulling aids (ropes and fishtape) to be removed from cable trays?

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PDR ADOCK 05000445  
Q PDR

<sup>W</sup>  
IP:CPPD:OSP:nh  
PWagner  
5/25/88

IP:CPPD:OSP  
HLivermore  
5/26/88 *HL*

AD:IP:CPPD:OSP  
RWarnick  
5/26/88 *RFW*

*MM*  
D:CPPD:OSP  
CGrimes  
5/26/88

*IEO*

3. What is the criteria for allowing a fishtape to be abandoned in a conduit, and if a "tight" fishtape is removed, what assurance can be provided that cable damage did not occur during the removal process?

Please provide the supplemental information within 20 days of the date of this letter.

Sincerely,

ORIGINAL SIGNED BY R. F. WARNICK

C. I. Grimes, Director  
Comanche Peak Project Division  
Office of Special Projects

cc:  
(See attached)



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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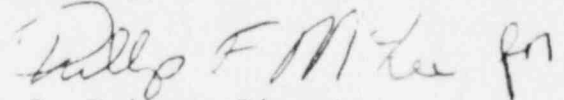
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3. What is the criteria for allowing a fishtape to be abandoned in a conduit, and if a "tight" fishtape is removed, what assurance can be provided that cable damage did not occur during the removal process?

Please provide the supplemental information within 20 days of the date of this letter.

Sincerely,

  
C. I. Grimes, Director  
Comanche Peak Project Division  
Office of Special Projects

cc:  
(See attached)

TU Electric

cc:

Roger D. Walker  
Manager, Nuclear Licensing  
Texas Utilities Electric Company  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, TX 75201

Juanita Ellis  
President - CASE  
1426 South Polk Street  
Dallas, TX 75224

Susan M. Theisen  
Assistant Attorney General  
Environmental Protection Division  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548

Administrative Judge Peter Bloch  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Elizabeth B. Johnson  
Administrative Judge  
Oak Ridge National Laboratory  
Post Office Box X, Building 3500  
Oak Ridge, TN 37830

Jack R. Newman, Esq.  
Newman & Holtzinger, P.C.  
1615 L Street, N.W., Suite 1000  
Washington, D.C. 20036

Walter H. Jordan  
Administrative Judge  
881 West Outer Drive  
Oak Ridge, Tennessee 37830

Anthony Z. Roisman, Esq.  
Suite 600  
1401 New York Avenue, N. W.  
Washington, DC 20005

Ms. Billie Pirner Garde, Esq.  
Government Accountability Project  
Midwest Office  
104 East Wisconsin Avenue  
Appleton, WI 54911

Nancy H. Williams  
CYGNA Energy Services  
Suite 390  
2121 N. California Blvd  
Walnut Creek, CA 94596

Robert A. Wooldridge, Esq.  
Worsham, Forsythe, Sampels  
and Wooldridge  
2001 Bryan Tower  
Suite 2500  
Dallas, TX 75201

Mr. Homer C. Schmidt  
Director of Nuclear  
Services  
TU Electric  
Skyway Tower  
400 N. Olive St., L.B. 81  
Dallas, TX 75201

Kenneth A. McCollom  
Administrative Judge  
1107 West Knapp  
Stillwater, OK 74075

GDS Associates, Inc.  
1850 Parkway Place, Suite 720  
Marietta, GA 30067-8237

Mr. R. W. Ackley  
Stone & Webster Engineering  
Corporation Project Mgr.  
CPSES  
Post Office Box 1002  
Glen Rose, Texas 76043

Mr. J. L. Vota  
Westinghouse Electric  
Corporation  
Post Office Box 355  
Pittsburgh, PA 15230

Lanny A. Sinkin  
Christic Institute  
1324 N. Capitol Street  
Washington, DC 20002

TU Electric

cc: (continued)  
David R. Pigott, Esq.  
Orrick, Herrington & Sutcliffe  
600 Montgomery Street  
San Francisco, CA 94111

Robert Jablon  
Bonnie S. Blair  
Spiegel & McDiarmid  
1350 New York Avenue, NW  
Washington, DC 20005-4798

George A. Parker, Chairman  
Public Utility Committee  
Senior Citizens Alliance of  
Tarrant County, Inc.  
6048 Wonder Drive  
Fort Worth, TX 76133

Joseph F. Fulbright  
Fulbright & Jaworski  
1301 McKinney Street  
Houston, TX 77010

Mr. Jack Redding  
c/o Bethesda Licensing  
TU Electric  
3 Metro Center, Suite 610  
Bethesda, MD 20814

William A. Burchette, Esq.  
Counsel for Tex-La Electric  
Cooperative of Texas  
Heron, Burchette, Ruckert &  
Rothwell  
Suite 700  
1025 Thomas Jefferson St., NW  
Washington, DC 20007

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011