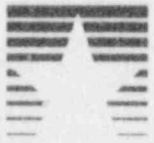

TU ELECTRIC

Log # TXX-88397
File # 10035

May 20, 1988

William G. Counsil
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
RESUBMITTAL OF GENERIC LETTER 83-28 ITEM 2.2.1

REF: W. G. Counsil letter TXX-6602 dated November 6, 1987
B. R. Clements letter TXX-4082 dated November 21, 1983

Gentlemen:

Since the submittal of the referenced letters, it has been noted that some of the information in those letters does not adequately represent the current CPSES program for administratively controlling the designation of safety-related components on plant documents and work performed on safety-related components. This letter is submitted to clarify our descriptions to reflect recent changes in procedures and maintenance-specific work practices.

Very truly yours,

W. G. Counsil

VPC/grr

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

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2.2.1 The classification of Structures, Systems and Components is determined by review of the applicable design documents such as, project design drawings, specifications, and Design Basis Documents (which include system decriptions). Design documents are classified with the highest classification of the components or equipment depicted in that Design Document in accordance with Engineering and Construction Engineering Procedure, ECE-DC-1, "Design Control General Requirements".

The CPSES Q-List was developed from a procedurally controlled review of applicable Design Documents to identify and itemize those Nuclear Safety Related components that require Quality Assurance in accordance with 10CFR50 Appendix B. Also included in the CPSES Q-List are those nonsafety-related components which require Quality Assurance due to their importance to safety.

The CPSES Q-List was developed to provide a tool for the operational phase of CPSES which expands the list of Quality Assured Systems and Major Components, as shown in the CPSES FSAR Table 17A-1, to the component level. The CPSES Q-List identifies quality related equipment which is individually tagged and is important to the control room operator for system operation. Excluded from the scope of the CPSES Q-List are quality related items such as, cable and raceway equipment, conduit and raceway supports, pipe, pipe supports, tubing, tubing supports, HVAC ductwork, HVAC supports, radiation seals, fire seals, rigid insulation, and structures. Classification of these types of equipment and structures excluded from the Q-List can be determined by reviewing applicable CPSES Design Documents.

The CPSES Q-List is being phased into a Master Equipment List (MEL). The classification of equipment within the MEL is controlled by Engineering and Construction Engineering Procedure, ECE 5.01-05, "Classification of Components". The MEL is maintained to depict the "As-Built" configuration of CPSES. The MEL is updated to reflect changes in Design Documents as they are revised.

2.2.1.1 Criteria for classification of equipment are contained in the CPSES Design Basis Document, DBD-ME-028, "Classification of Structures, Systems and Components." These criteria are incorporated, as applicable, into other Design Basis Documents, FSAR chapters, calculations, specifications, project design drawings, and the MEL.

2.2.1.2 The information handling system used to provide Q-List data is the Automated Configuration Control and Equipment Support System (ACCESS). This system is a relational database containing a document management system module, activity tracking control module, design information control module and the master equipment reference module. This system is being developed to support the configuration control of CPSES and the MEL. Procedural control of the MEL is provided by a Nuclear Engineering and Operations Procedure, an Engineering and Construction Engineering Procedure and a Station Administration Procedure each entitled "Master Equipment List".

2.2.1.3 The determination of equipment classification is required prior to the start of Operations' work activities. Station Administration Procedure, STA-606, "Work Requests and Work Orders" requires that prior to the commencement of work activities such as, maintenance, part replacement and design modification, the activity is designated as quality or nonquality related. Station Administration Procedure, STA-403, "Identification of Quality Related Equipment" requires review of the MEL to determine the QA requirement for a component. This procedure also governs the methods used for determination of the classification of equipment which is not within the scope of the MEL. When additional information is required for equipment, an "Item Classification Request for Quality-Related Purposes" is sent to Comanche Peak Engineering to determine the QA requirements.

Plant documents such as, operation procedures, maintenance and testing instructions, which are used to control, maintain or test safety-related equipment, are currently designated as Quality Related, Safety-Related or QA Record. As these procedures are revised these documents will be identified as "Quality-Related".