

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

March 20, 1986

WILLIAM G. COUNSIL
EXECUTIVE VICE PRESIDENT

Director of Nuclear Reactor Regulation
Attention: Mr. Vince S. Noonan, Director
Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
PIPING AND PIPE SUPPORT QUALIFICATIONS

- Ref: 1. TXX-4504 dated June 28, 1985
2. Comanche Peak Response Team Program Plan
And Issue Specific Action Plans. Revision 3
dated January 27, 1986
3. TXX-4721 dated February 28, 1986

Dear Mr. Noonan:

TUGCo provides with this letter further explanation of the status of the Stone & Webster qualification program, mentioned in reference 3. TUGCo first notes that it intends to adhere to the principles set forth in reference 1 that, in the execution of the CPRT program, alternatives to prior licensing commitments will be employed only to the extent they are acceptable and necessary for timely resolution of issues. As noted in the latest revision to the CPRT Program Plan (reference 2), Appendix C, DSAP IX, Attachment 2, page 9, the Stone & Webster qualification effort may require revision of some prior licensing commitments with respect to portions of the ASME code, code cases, or other items as appropriate. As noted in the Program Plan, appropriate revisions to the FSAR will be requested.

If in the course of work performed by Stone & Webster, different standards are utilized than previously approved licensing commitments, TUGCo will submit those standards to the NRC for approval, with appropriate justification for the change. We fully recognize that acceptance of work done to such different standards is contingent upon NRC approval.

Very truly yours,

W. G. Council
W. G. Council

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