

Log # TXX-88485
File # 10110
903.9
Ref. # 10CFR50.55(e)

William G. Council
Executive Vice President

June 1, 1988

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
ELECTRICAL RACEWAY SUPPORT SYSTEM
SDAR: CP-85-31 (FINAL REPORT)

Gentlemen:

On December 5, 1986, we notified you by our letter logged TXX-6138 of a deficiency involving the Unit 1 Class 1E Electrical Raceway Support System which we deemed reportable under the provisions of 10CFR50.55(e). This is a final report submitted to status corrective actions implemented to date. Our latest report, logged TXX-88039 was submitted January 6, 1988.

Separation Barrier Material (SBM) and Radiant Energy Shield (RES) material were installed on Class 1E electrical raceways (cable trays and conduits) in order to meet the FSAR and Regulatory Guide 1.75 electrical separation criteria. However, the design of conduit and conduit supports which were installed prior to the SBM and RES installation did not account for the additional weight imposed. The cause of this condition is attributed to inadequacy of the governing documents which did not require analysis by civil/structural engineering for the extra weight imposed on electrical raceways by the additional material.

The affected SBM and RES has been removed. The removal of RES and SBM is being verified by our quality organization. This will effectively eliminate this reportable deficiency, and therefore completion of the modification and addition of supports affected by the installation of RES, previously reported in TXX-6689 as corrective action, is no longer required to close this issue. Completion of activities and supporting documentation will be available for your inspectors review July 18, 1988.

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The following actions are being implemented to preclude recurrence of this deficiency in future RES installations:

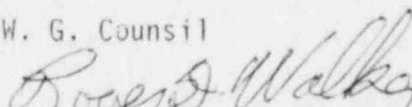
1. Electrical Raceways which require installation of RES are identified by ECE-MI-1700, "Thermo-Lag and RES Schedule." This document receives Interdiscipline Review (IDR) per ECE-5.09-01, "Design Verification and Interdiscipline Review." The purpose of IDR by engineering disciplines is to identify and assess the impact of the design change on the other disciplines' area of responsibility. Any calculation revision or addition of or modification to electrical raceway supports will be scheduled and completed subsequent to the IDR.
2. RES will be installed in accordance with appropriate engineering and construction procedure(s) and will comply with the requirements of the applicable installation specification. Engineering and construction procedure(s) will require civil engineering release of raceways prior to RES installation and this release will indicate that the raceway has been analyzed for additional weight imposed by RES. Procedure ECC-10.07, "Application of Thermo-Lag/RES Fire Protection System," is currently projected for issuance by June 30, 1988.

No new SBM installation's are anticipated at this time. Any future installation of SBM, however, would be subject to the same procedural requirements as RES.

Very truly yours,

W. G. Council

By:


R. D. Walker
Manager, Nuclear Licensing

DAR/amb

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