



TUELECTRIC

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File # 10004
905.4

June 10, 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)
USE OF ASME CODE CASE N-253-2
"CODE CASE APPROVAL REQUEST"

- REF: 1) TUGCO letter (Nuclear Reactor Regulation) TXX-4960 from
W. G. Council to V. S. Noonan, dated August 26, 1987.
- 2) NRC letter "Use of ASME Code Case N-253-2" from C. I. Grimes,
(Office of Special Projects) to W. G. Council, dated
March 3, 1988.

Gentlemen:

The Staff has approved TU Electric's request to use ASME Code Case N-253-2, "Construction of Class 2 and 3 Components for Elevated Temperature Service, Section III, Division 1" contingent upon a stipulation that the Stamping and Data Report shall indicate the Code Case number and applicable revision. The following information is being provided for clarification on meeting ASME Section III Stamping and Data Report requirements.

Since the completion of Construction Code (ASME Section III) requirements at CPSES, which included completion of the N-5 and N-3 Certifications, the rules of ASME Section XI have applied to activities involving code class items. The rules of ASME Section XI allow the owner (TU Electric) to invoke portions of later editions of the Construction Code (ASME Section III), including code cases. ASME Section XI does not require that the organization performing repairs/replacements of code class items including N-stamped components, to stamp the work or to be a holder of a certificate of authorization. Additionally, ASME Section XI does not require the reissuance, revision, supplement, etc., of the original Data Reports (N-5, N-3, N-1, etc.) as a result of activities implemented on a code class item. Instead ASME Section XI requires that a repair/replacement plan provide details regarding applicable codes, that the design specifications conform to the as-built condition and that repairs/replacements for those activities be certified in accordance with ASME Section XI by documenting these activities on the NIS-2, "Owner's Report for Repair or Replacements".

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TU Electric has met the rules of the Code Case and the applicable Stamping and Data Report requirements are in compliance with the appropriate ASME Sections. Therefore, the stipulation relating to Stamping and Data Report certification has been met by TU Electric as indicated in the above discussion.

Very truly yours,

W. G. Council

W. G. Council

By: *J. S. Marshall*

J. S. Marshall
Generic Licensing Manager

DAR/grr

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