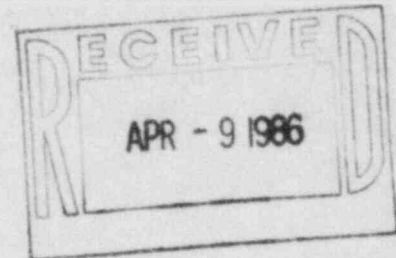


TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

April 3, 1986

WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT



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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
STATUS OF AS-BUILT-VERIFICATION PROGRAM

Ref: TXX-3597 of December 3, 1982

Dear Mr. Martin:

Texas Utilities Letter TXX-3597 dated December 3, 1982 described the CPSES As-Built-Verification Program initiated in response to IE Bulletin 79-14. Specifically, items 2 and 3 of the bulletin required inspections of safety related piping systems to verify that drawings relied on for seismic analyses accurately reflected the as-built condition. Construction permit holders were required to report the results of these inspections within 120 days. This reporting requirement appeared to be directed toward plants where piping systems were substantially complete. Since the CPSES piping systems of concern were still under construction at the time the bulletin was issued, the reporting requirement was deemed to be inappropriate. Rather, the inspection and verification requirements of the bulletin were incorporated into the appropriate CPSES design and construction procedures. Based on these procedures the reference letter closed our response to the bulletin.

Implementation of these procedures has been ongoing throughout construction of Units 1 and 2. The Unit 1 program is now complete; the Unit 2 program is continuing. As a result of design verification requirements arising from the CPSES licensing proceedings, TUGCo commissioned Stone and Webster Engineering Corporation (SWEC) to perform stress requalifications of code piping and pipe supports. To establish sufficient confidence in the adequacy of dimensions and functions shown on drawings used in their analyses, SWEC sampled Unit 1 as-built documentation to verify the following attributes:

- o Valve location
- o Pipe support location
- o Pipe support function
- o Valve and support orientation

A DIVISION OF TEXAS UTILITIES ELECTRIC COMPANY

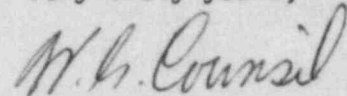
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With the exception of discrepancies in the tolerance of some valve and support orientations, the review determined that the remaining attributes were adequate. TUGCo initiated an inspection of all valve and support orientations, issuing non-conformances where conditions were found to be outside tolerance limits. Any modifications resulting from the non-conformances or from the SWEC requalification effort will be performed in accordance with the CPSES as-built program, which requires that any modifications to piping systems or supports be reconciled with seismic analyses.

Very truly yours,



W. G. Council

BSD/arm

c - U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20503

Mr. Vince Noonan