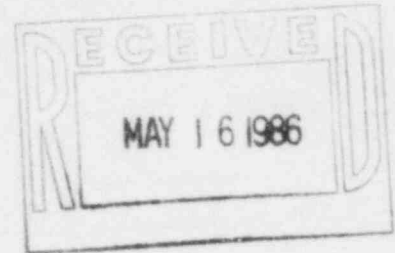


Log # TXX-4801
File # 10110
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TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER · 400 NORTH OLIVE STREET, L.B. 81 · DALLAS, TEXAS 75201

May 14, 1986



WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT

Mr. Eric H. Johnson, Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
SERVICE WATER DISCHARGE PIPING
SDAR: CP-86-28 (FINAL REPORT)

Dear Mr. Johnson:

On April 14, 1986, we verbally notified your Mr. T. F. Westerman of a deficiency involving the non-nuclear safety classification of the service water piping located outside buildings. This evaluation is the result of a Part 21 notice provided to the NRC by Gibbs & Hill.

The subject piping was designed, purchased, and installed as Safety Class 3 and is entirely buried in a Class 1 backfill up to the discharge structure. The piping is considered to be seismically supported thus seismic failure is not applicable. The actual change in classification was made after installation at the last weld in the buried portion of the pipe approximately 40 feet from the point of discharge. This change in classification will not compromise the service water system's ability to provide safety related cooling. Even considering a moderate energy leakage crack in the non-safety portion of the piping, any leakage would flow downhill to the Safe Shutdown Impoundment. Therefore, this non-safety portion of piping is not a cause for a plant safety concern. We have concluded that this issue is not reportable under the provisions of 10CFR50.55(e). Records supporting this determination are available for your inspectors to review at the CPSES site.

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".

W. G. Council

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Washington, D.C. 20555

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