

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT

May 23, 1986

Mr. Vincent S. Noonan
Director, Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

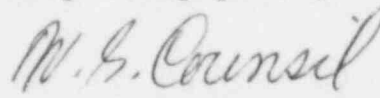
**SUBJECT: RESPONSE TO NRC QUESTIONS TRANSMITTED BY
LETTER DATED MAY 15, 1986**

Dear Mr. Noonan:

Attached please find our responses to your additional comments regarding the results report for ISAP VII.b.2 on Valve Disassembly.

Should you have further questions, please call either myself or Mr. John Beck.

Very truly yours,



W. G. Council

WGC:tj

Attachment

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ISAP VII.b.2 - Valve Disassembly

NRC COMMENTS/RESPONSES

ITEM 1

COMMENT: Procedure CP-CPM 6.9 (Revision 6) DCN3 requires that procedures be in place to control the valve disassembly process. This procedure was dated January 28, 1983. The implementing procedure (CP-CPM 9.18 Revision 0) was issued on June 8, 1983, four months later. Since valves were disassembled during this period, explain how such activities were controlled.

RESPONSE: Prior to January 28, 1983, valve disassembly was accomplished under CP-CPM-6.9 including Appendix E (CPM-6.9E). (Note, a CPM is a construction procedure used by craft to perform their work.) Up to this date CPM-6.9 and 6.9E (all revisions) contained instructions governing valve disassembly and required valve disassembly to be controlled and documented using operation travelers which contain the instructions to the craft for the disassembly process. The issuance of DCN3 to CPM-6.9E (Revision 6) on January 28, 1983, deleted the instructions for valve disassembly, deleted the reference to the operations traveler CPM and referenced CPM-9.18. CPM-9.18 was not issued for use until June 8, 1983. The delay in the issuance of CPM-9.18 was due to the time delay in preparing the generic valve type checklists included as attachments to CPM-9.18. The text section of CPM-9.18 though not issued was available and understood by craft on January 28, 1983. During the four month period in question, valve disassembly continued to be accomplished using operation travelers. A review of a sample of the travelers written between January 28, 1983, and June 8, 1983, showed them to be similar in content and format to those used prior to the issuance of DCN3. Thus, the valve disassembly process continued unchanged despite the procedural discrepancy. The issuance of CP-CPM-9.18 (Revision 0) on June 8, 1983, covered all requirements which had been in CPM-6.9E prior to DCN3, including methods of documentation.

NRC COMMENTS/RESPONSES (Cont'd)

ITEM 1 (Cont'd)

Additionally, the pertinent portion of the applicable quality assurance procedure (QI-QAP-11.1.26 Revisions 9 through 12) including the requirement for a traveler to govern the valve disassembly process remained unchanged during the four month period. The use of a traveler and the QI-QAP provided adequate process control during this time frame.

ITEM 2

COMMENT: Regarding our question number 2 on ISAP VII.b.2 concerning valve bonnets, the use of bonnets without required supporting QA documentation is an apparent violation of the ASME Code. If the valves at issue are ASME Code valves, in response to a licensing commitment, then appropriate actions must be taken to establish ASME Code conformance or, alternatively, modified licensing commitments must be submitted to the staff with supporting justification.

RESPONSE: As stated in the Results Report, there were no cases found of using a non-ASME bonnet on an ASME valve. The discussion on this subject in the Results Report is provided only as a postulated hypothetical case.