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William G. Council
Executive Vice President

June 15, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
ENGINEERING CONTRACTOR RESPONSIBILITIES FOR
THE CABLE TRAY HANGER (CTH) CORRECTIVE ACTION
PROGRAM (CAP)

Gentlemen:

As we have previously informed the NRC Staff, some changes have recently been implemented in the engineering contractors' management responsibilities (and related procedures) in order to facilitate completion of the relatively small amount of remaining engineering and design effort in the Cable Tray Hanger (CTH) discipline. This letter will summarize these changes in responsibilities and how this effort will be completed.

As described in the Cable Tray and Cable Tray Hangers Project Status Report (PSR) and other TU Electric correspondence to the NRC, Impell and Ebasco are the engineering contractors responsible for performing the CTH Corrective Action Program (CAP) for Unit 1 and Common. Impell's responsibility has included cable trays and cable tray hangers in the Reactor Building and the Safeguards Building. Ebasco's responsibility has included all other Unit 1 and Common cable trays and cable tray hangers. Impell and Ebasco completed the CTH design validation and initiated implementation of the CTH hardware validation in accordance with their respective design control and technical procedures and their TU Electric approved QA programs (with the exception that Ebasco engineering walkdowns were performed in accordance with the TU Electric QA program).

These previously separate but coordinated CTH design and engineering activities of Impell and Ebasco have been consolidated into an integrated effort. The resulting CTH discipline will continue to be staffed by personnel from both engineering contractors, with Impell being assigned overall management responsibility. The Impell and Ebasco CTH technical procedures have been re-issued as CPE procedures and are being utilized by the contractors for CTH design and engineering work. In addition, the remaining CTH design and engineering are being performed in accordance with CPE design control procedures (ECE procedures) under the TU Electric QA Program.

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Thus, it should be emphasized that these changes in no way affect TU Electric commitments as to CTH technical procedures and methods contained in CAP description documents or the Cable Tray and Cable Tray Hanger PSR. The substance of those technical procedures and methods remains unchanged.

Please contact me if any additional information is required concerning these changes in the CTH discipline engineering contractor responsibilities.

Very truly yours,

W. G. Council

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By: *J. S. Marshall*

J. S. Marshall
Generic Licensing Manager

JDS/grr

c - Mr. R. D. Martin, Region IV
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