TU ELECTRIC

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June 16, 1988

William G. Counsil
Executive Vice President

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
CLASS 5 PIPE SUPPORTS
SDAR: CP-87-62 (SUPPLEMENTAL REPORT, UNIT 1)
(FINAL REPORT, UNIT 2)

Gentlemen:

On September 30, 1987, we notified you by our report logged TXX-6731, of deficiencies in the use of nomographs to design seismically supported Class 5 piping systems which we deemed reportable under the provisions of 10CFR50.55(e). We subsequently issued reports TXX-88001, TXX-88284, and TXX-88465 dated January 12, 1988, March 1, 1988, and May 18, 1988 respectively to provide status of completion of our corrective actions. A written report was due on June 14, 1988. On June 14, 1988, we verbally requested and received an extension from your Mr. H. S. Phillips until June 21, 1988. This report is being provided to inform you of revisions to certain of our previously discussed corrective actions, and the current implementation schedule (including the Post Construction Hardware Validation Program).

In our report TXX-6731, the corrective and preventive actions identified field verification activities to be performed and the applicable specifications and procedures to be issued or revised. The following provides a description of the corrective and preventive actions as discussed in TXX-6731 and the current status.

a) Specification 2323-MS-46B will be revised to include appropriate criteria for the use of nomographs.

Status: Specification 2323-MS-46B, "Non-Nuclear Pipe Hangers and Supports," is being revised and will no longer contain design information. Therefore, this item is no longer valid. Instead, Design Basis Document DBD-CS-068, "Non-ASME Piping and Support Design," has been issued to require that nomographs be utilized only in accordance with approved engineering procedures.

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A significant percentage of the Unit 1 design changes have been implemented. These changes provide objective evidence of implementation of the programmatic corrective actions. These records are presently available for review by your inspectors at the CPSES site.

The actions discussed in items (c), (d), and (e) above are also applicable to Unit 2. During the construction process, existing and future Unit 2 installations will be accepted using the revised design criteria.

No further reports are anticipated for Unit 1 or Unit 2.

Very truly yours,

W. G. Counsil

By: D. R. Woodlan
D. R. Woodlan
Docket Licensing Manager

CBC/grr

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

b) A hardware validation program is being implemented via Field Verification Method CPE-SWEC-FVM-PS-082 to perform an engineering walkdown, evaluation analysis, resolution of design concerns, and establishment of design basis.

Status: As a result of the Unit 1 hardware validation program, Design Change Authorizations (DCAs) are being issued to address the required modifications. The implementation of these modifications is being performed as part of the seismic Category II over I validation effort. Approximately one-third of the design changes identified to date have been implemented. The remaining design changes will be implemented prior to fuel load.

The establishment of a design basis is discussed in item (e) below.

c) Products of the hardware validation program will be documented and controlled by procedure ECE 2.13. "Retention and Control of Engineering Documents," to provide traceability of the design basis.

Status: Procedure ECE 2.13, which is now entitled, "Control of Documents Designated to Become Records," has been issued. This procedure assures that adequate controls exist for documentation resulting from this corrective action plan.

d) Procedure ECE 5.05, "Drawing Control," will be issued to assure that configuration (consistent with the design documentation) is maintained.

Status: All future modifications to validated design within the scope of Field Verification Method CPE-SWEC-FVM-PS-082 are being controlled via DCA's in accordance with procedure ECE 5.05-03, "Pipe Support Drawings and Pipe Support Location Isometrics."

e) Design Basis Document DBD-CS-068, "Non-ASME Piping and Support Design," and procedures ECS 5.03-05, "Non-ASME Pipe Stress Analysis," and ECS 5.03-06, "Non-ASME Pipe Support Design," will be issued to assure Seismic Category II large bore pipe supports and the associated Class 5 piping are designed to acceptable and approved engineering criteria.

Status: Procedures ECS 5.03-05 and ECS 5.03-06 are examples of engineering procedures that typically could be utilized to incorporate instructions on the use of nomographs. However, other procedures may also provide this information; therefore we are deleting reference to specific procedures used to comply with DBD-CS-068. As stated in item (a) above, DBD-CS-068 has been issued. It requires that nomographs be utilized only in accordance with approved engineering procedures.