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903.10
Ref. # 10CFR50.55(e)

William G. Council
Executive Vice President

January 11, 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
TRACEABILITY OF 1E PIGTAIL EXTENSIONS
SDAR: CP-86-38 (INTERIM REPORT)

Gentlemen:

On May 27, 1986, we verbally notified your Mr. T. F. Westerman of a deficiency involving the failure of project procedures to adequately address the installation and inspection criteria for cable runs used as device pigtail extensions. After further evaluation, we have determined that this deficiency is reportable under the provisions of 10CFR50.55(e) and the required information follows. Our latest report, logged TXX-6820, was submitted October 5, 1987.

Description of Deficiency

Design drawing 2323-E1-1701, Details 13 and 18, provide generic details for reducing low voltage power cable at equipment (splicing power tap from a power cable to the equipment using a cable of a smaller gauge than the power cable) and splicing of pigtail extensions at instruments and control equipment. However, splices performed in accordance with the design drawing details were not shown on the system design drawings and wiring diagrams, and site inspection and installation procedures did not adequately address these splices. This has resulted in the loss of traceability of these splices.

The cause of this deficiency is the failure to incorporate the installed splices into the design drawings in order to assure proper inspection and traceability. This deficiency extends to all cable reduction splices and pigtail extensions.

Safety Significance

Due to the extensive nature of this condition, each splice will not be subjected to a detailed analysis for safety significance. We have conservatively assumed that this condition would have adversely affected safe plant operations and, in consideration of the extensive efforts necessary to establish the adequacy of these pigtail extensions to perform as required, have deemed this issue reportable under 10CFR50.55(e).

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Corrective Actions

This issue has been evaluated and documented per Specific Technical Issue Report (STIR) CPE-F-004 and Corrective Action Report (CAR) 63, Rev. 1. As stated in these documents, corrective actions consist of:

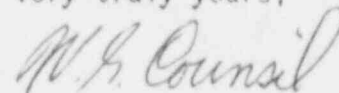
1. Incorporation of all Class 1E Detail 13 and 18 splices into the electrical wiring diagrams.
2. Rework of Detail 18 splices that have been installed in flexible conduit.
3. Rework of Detail 13 and 18 splice installations where cable traceability or splice documentation is indeterminate, or specific engineering approval is not provided for the connection.

Details 13 and 18 splices have been identified via walkdowns performed using Field Verification Methods CPE-FVM-EE-021 and 022, respectively, for Unit 1 and common areas. Non-Conformance Reports (NCRs) were initiated from the walkdown data to accomplish the above corrective actions. Corrective actions for Unit 2 will be initiated following the completion of the Unit 1 and common areas.

To prevent recurrence, Detail 18 has been revised (Design Change Authorization (DCA) 21912, Rev. 2) to eliminate splices in conduit and installation of unscheduled termination boxes. In addition, Detail 13 has been revised (DCA 31435, Rev. 0) to require engineering approval, via a specific DCA, of all cable reduction splices. Electrical Installation Specification 2323-ES-100 has also been revised to require all reduction splices to be approved by Engineering prior to installation.

We will provide a status of the resolution of the above NCRs in our next report, which we will submit no later than February 21, 1988. This report will also include a status update on Unit 2 corrective actions.

Very truly yours,



W. G. Council

RSB/grr

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