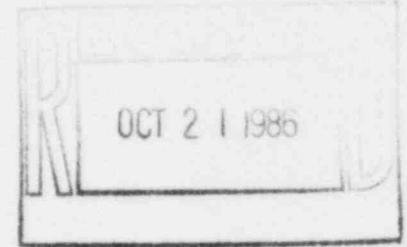


**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER - 400 NORTH OLIVE STREET, L.B. 81 - DALLAS, TEXAS 75201

October 20, 1986

WILLIAM G. COUNSIL  
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 (CPSES)  
DOCKET NO. 50-445  
ELECTRICAL RACEWAY SUPPORT SYSTEM  
SDAR: CP-85-31 (INTERIM REPORT)

Dear Mr. Johnson:

On August 27, 1985, we verbally notified your Mr. D. Hunnicutt of a deficiency involving the impact on the electrical raceway support system due to additional weight imposed by the installation of Separation Barrier Material (SBM) and Radiant Energy Shield (RES) Material on Unit 1 electrical conduit raceways without complete interdisciplinary review and design analysis. This is an interim report of a potentially reportable item under the provisions of 10CFR50.55(e). Our latest interim report, logged TXX-4883, was submitted on June 27, 1986.

The scope of this issue is limited to Unit 1 Electrical Conduit Raceways. The impact of SBM weights imposed on Unit 1 Cable Tray Hanger (CTH) Systems is being evaluated as part of the overall CTH design verification activities addressed by SDAR-CP-85-35, Cable Tray Hanger Design.

SBM and RES material were installed on Unit 1, Class 1E electrical raceways consistent with the FSAR and Regulatory Guide 1.75, Revision 1. The engineering evaluation, prior to SBM and RES material installation, did not consider the additional weight imposed by these materials.

Although this concern is not a specific CPRT program plan item, the evaluation and disposition of this issue is being formulated in the course of the civil/structural design verification program outlined in CPRT Program Plan Item, DSAP VIII.

Failure of seismic category conduits and conduit supports to meet the required design criteria could result in an inability of associated safety-related systems to perform as required for safe operation and shut down.

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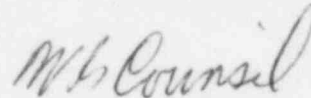
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Page 2

Currently, we have identified the conduit raceways affected by the installation of RES material. Our identification of the raceway population affected by the presence of SBM is incomplete. The evaluations completed to date indicate the conduit and supports are adequate when considering the additional weight imposed by the protective materials.

Based on the project schedule for these engineering activities, we anticipate submitting our next report by December 5, 1986.

Very truly yours,



W. G. Council

JCH/amb

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Washington, D.C. 20555