Log # TXX-6049 File # 10110 903.9

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER · 400 NORTH OLIVE STREET, L.B. 61 · DALLAS, TEXAS 75801

October 21, 1986

WILLIAM & COUNSIL



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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 THERMOLAG ON CONDUIT SUPPORT SDAR: CP-85-42 (INTERIM REPORT)

Dear Mr. Johnson:

On September 20, 1985, we verbally notified your Mr. T. F. Westerman of a deficiency involving the possible adverse effect of the substitution of rectangular and oversized pre-formed sections of thermolag on conduit installations. Our latest report, logged TXX-4806, was submitted on May 16, 1986. We are reporting this issue under the provisions of 10CFR50.55(e) and the required information follows.

DESCRIPTION

Thermolag fire protective coating was installed on Unit 1, Class IE Electrical conduit Raceways consistent with FSAR and Regulatory Guide 1.120, Revision 1.

In the original design, fire protection weight was assumed considering a round configuration of thermolag material around conduits. However, to facilitate adequate coverage of field run conduits, thermolag in square configurations has been substituted in some locations. Without engineering verification to determine if square shapes were enveloped by the design assumptions, field verifications have been conducted to provide as-built information regarding thermolag size and shape installations. This data has been evaluated and resulted in the identification of several instances of excessive loading of conduit and inadequate conduit support. In these instances, the stresses are in excess of allowable due to conduit couplings installed between supports.

This issue is being evaluated under CPRT Program Plan DSAP VIII and is limited to Unit 1 electrical conduit raceways and supports.

SAFETY IMPLICATIONS

Failure of seismic category conduits and conduit supports could result in an inability of associated safety-related systems to perform, as required, for safe operation and shutdown.

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CORRECTIVE ACTION

Engineering analysis will continue for affected conduits, supports and associated appurtenances such as junction boxes. The final evaluation and corrective actions include additional testing activities currently underway and additional review by the Fire Protection Group to confirm the necessity for thermolag installation. These activities are currently scheduled for completion on November 17, 1986.

Revised engineering and construction requirements have been issued to prevent recurrence of this deficiency.

We anticipate submitting our next report December 15, 1986.

Very truly yours. y Counsil

W. G. Counst] By: G. S. Keeley Manager, Nuclear/Licensing

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