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August 28, 1986

Peter B. Bloch, Esquire  
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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. Kenneth A. McCollom  
Administrative Judge  
1107 West Knapp  
Stillwater, Oklahoma 74075

Dr. Walter H. Jordan  
Administrative Judge  
881 West Outer Drive  
Oak Ridge, Tennessee 37830

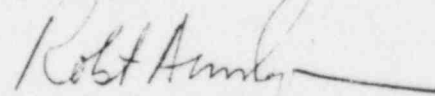
Elizabeth B. Johnson  
Oak Ridge National Laboratory  
P. O. Box X, Building 3500  
Oak Ridge, Tennessee 37830

Re: Texas Utilities Electric Company, et al  
(Comanche Peak Steam Electric Station,  
Units 1 & 2); Docket Nos. 50-445 and 50-446 OL

Dear Administrative Judges:

The attached letter of August 26, 1986, from M. D. Spence to Richard J. Stuart, President of Cygna Corporation, is provided for the Board's information.

Respectfully,

  
Robert A. Wooldridge

RAW/klw

cc: Service List

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

MICHAEL D. SPENCE  
PRESIDENT

August 26, 1986

Mr. Richard J. Stuart, President  
Cygna Corporation  
101 California Street, Suite 1000  
San Francisco, California 94111

Subject: Comanche Peak - Independent Assessment Program

Dear Mr. Stuart:

This is in response to your letter of August 1, 1986.

By separate mail, we are sending you information concerning the open items of your Phase 4 report. This information provides all of the answers to questions listed in your letters numbered 84056-.088, .090, .092, .093, .094 and should enable you to complete your Phase 4 report. It is our understanding from our management meetings with you that Cygna will issue its report within four weeks of receipt of the aforementioned information. Upon issuance of your Phase 4 report, it is our view that Cygna will have fulfilled its obligation under existing contracts.

Since the Cygna review effort at Comanche Peak was first initiated in 1983, numerous developments have taken place. As you are aware, we have established a comprehensive program (CPRT) to evaluate and resolve outstanding issues relating to the design and construction of Comanche Peak, including those issues identified by you, and to undertake corrective measures where appropriate. This effort is being conducted or overseen by third-party organizations. Substantial corrective measures in areas where Cygna has raised many concerns, such as piping, pipe supports, and cable tray supports, are being performed by established engineering organizations which had no involvement in the original design or construction activities at Comanche Peak. In many instances, those measures include one hundred percent redesign or reverification. Additional comprehensive design reviews, which will be reviewed and approved by the CPRT, are in the planning stage at this time. Consequently, for all practical purposes, the Cygna effort, as it was originally conceived, has been superseded by a much larger and more comprehensive program.

Because of this, it is our present plan to rely principally on the CPRT program and those organizations associated with corrective action and overview to provide reasonable assurance to the N.R.C. that Comanche Peak is designed

Mr. Richard J. Stuart

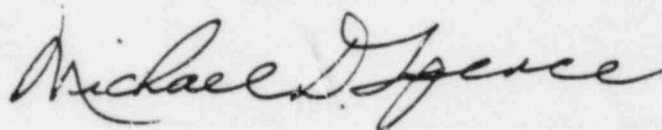
August 26, 1986

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and constructed to operate safely. With the exception of issuing the Phase 4 report, TUGCO does not consider the other additional activities suggested in your letter of August 1, 1986, to be necessary. However, we recognize that there may be a need for discussions between Cygna and the organizations involved in the reverification effort to seek clarification of your findings to assure that they are adequately addressed.

Should you have any questions, please feel free to call me.

Very truly yours,

A handwritten signature in cursive script, reading "Michael D. Spence". The signature is written in dark ink and is positioned to the right of the typed name "MDSpence/lm".

MDSpence/lm

cc: Service List