TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER - 400 NORTH OLIVE STREET, L.B. 81 - DALLAS, TEXAS 75201

Log # TXX-6075 File # 10068 clo 10010

WILLIAM G. COUNSIL

November 4, 1986

Director of Nuclear Reactor Regulation Attention: Mr. Vince S. Noonan, Director Comanche Peak Project Division of Licensing U. S. Nuclear Regulatory Commission Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

DOCKET NOS. 50-445 AND 50-446

TRANSMITTAL OF DOCUMENTS FOR EVALUATION AND RESOLUTION OF CYGNA TRAIN A AND B ISSUES AS APPLICABLE TO TRAIN C CONDUIT SUPPORTS

Dear Mr. Noonan:

Enclosed are 15 copies of the documents for "Evaluation and Resolution of CYGNA Train A and B Issues as Applicable to Train C Conduit Supports" prepared by Impell Services Incorporated for Texas Utilities Generating Company. These documents are part of the Comanche Peak Response Team Cable Tray and Conduit Support Program initiated by Texas Utilities. A list of enclosures is attached for your convenience.

Should you have any questions, please do not hesitate to call John Beck or myself.

Very truly yours,

W. G. Counsil

JDS/grr Attachment Enclosures

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TXX-6075 Attachment 1 Page 1 of 2

ATTACHMENT 1 LIST OF ENCLOSURES

Enclosure A:

Texas Utilities Generating Company

Comanche Peak Steam Electric Station, Generic Technical Issues Report - Evaluation and Resolution of CYGNA Train A and B Conduit Issues as Applicable to Train C Conduit

Supports

Enclosure B:

Texas Utilities Generating Company

Comanche Peak Steam Electric Station, Evaluation and Resolution of CYGNA Train A and B Conduit Issues as Applicable to Train C Conduit Supports, Impell Summary

Matrix.

Enclosure C:

Impell Reference Documents, 4 volumes as follows

Enclosure C1:

Volume I

Letter No. 84056-095 from N. H. Williams (Cygna) to W. G. Counsil (TUGCO) dated November 26, 1985, Subject: Review Issues List (RIL), Texas Utilities Generating Company, Comanche Peak Steam Electric Station, Independent Assessment Program - All Phases.

Impell Project Instruction "Seismic Evaluation of Train C Supports", Project Instruction No. 0210-052-003, Revision 1, Job No. 0210-052-1355, Impell Corporation, Walnut Creek, CA,

1986.

Impell Calculation No. ROTC-6, "Multi-Mode Factor Evaluation - Train C Conduit", Revision 1, Job No. 0210-052-1355.

Enclosure C2:

Volume II

Impell Project Instruction "Multi-Level Screening Criteria for Train C Conduit (Two Inch and Under) at Comanche Peak Steam Electric Station", Project Instruction No. 0210-053-001, Revision 5, Job No. 0210-053-1355, Impell Corporation,

Walnut Creek, CA, 1986.

Enclosure C3:

Volume III

"Test Report for Static Testing of Train C Beam Clamps and Unistrut Hangers for CPSES", CCL Report No. A-720-86, July 10, 1986.

Impell Calculation No. ROTC-02, "Prying Factors," Revision O, Job No. 0210-052-1355.

Impell Project Instruction "Rigorous Analysis of Train C Conduit", Project Instruction No. 0210-052-006, Revision 1, Job No. 0210-052-1355.

TXX-6075 Attachment 1 Page 2 of 2

ATTACHMENT 1 LIST OF ENCLOSURES (CONT'D)

Enclosure C4: Volume IV

Impell Report No. 01-0210-1479, Rev. 1, "Comanche Peak Steam Electric Station, Train C Conduit Two Inch and Under Criteria Document", June, 1986.

Impell Project Instruction, "Dynamic Analysis of Cable Tray Systems", Project Instruction No. P1-02, Revision 4, Job No. 0210-040.

"Test Plan - Dynamic Testing of Typical Cable Tray Support Configurations", Document No. A-000150 Rev. 1, December, 1986 by ANCO Testing Laboratory.

Impell Special Study No. 5.9, "Oversize Bolt Holes", Preliminary Issue.

P: 1 of 4 10,23/86 Rev. 0

TEXAS UTILITIES ERATING COMPANY COMANCHE PEAK STEAM ELECTRIC STATION IMPELL EVALUATION AND RESOLUTION OF CYGNA TRAIN A AND B CONDUIT ISSUES AS APPLICABLE TO TRAIN C CONDUIT SUPPORTS SUMMARY MATRIX

	GENERIC TECHNICAL ISSUE TITLE	SUB-ISSUE DESIGNATION	GENERAL ISSUE CATEGORY	IMPELL ISSUE RESOLUTION	
PPENDIX UMBER				REFERENCE*	SECTION
01	Governing Load Case for Design	-	AMA	2 9	4.2.1 4.3
02	Dynamic Amplification Factors		AMA	2	4.1.3
03	Combination of Dead⊎eight and Seismic Responses		AMA	2	4.2.2
04	Measurement of Embedment from Top of Topping	·	DC	2 4	4.3.5 Part II
05	Bolt Hole Tolerance and Edge Distance Violation	Α	DC	14 15 16	
		В	DC	**	
06	FSAR Load Combinations	-	DC	8	4.6.2
07	Support Self Weight		AMA	2 4	4.2.1 Part II
08	Torsion of Unistrut Members		AMA	6	

ISSUE CATEGORY LEGEND

AMA - Analysis Methods & Assumptions

DC - Design Criteria

DOCC - Design Document Control AB - As-Built vs. As-Designed *Reference numbers refer to Section V of the Impell Train C Cygna Issue report

^{**}Reference under development

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TEXAS UTILITIES ERATING COMPANY COMANCHE PEAK STEAM ELECTRIC STATION IMPELL EVALUATION AND RESOLUTION OF CYGNA TRAIN A AND B CONDUIT ISSUES AS APPLICABLE TO TRAIN C CONDUIT SUPPORTS SUMMARY MATRIX

		SUB-ISSUE DESIGNATION	GENERAL ISSUE CATEGORY	IMPELL ISSUE RESOLUTION	
IPPENDIX IUMBER				REFERENCE*	SECTION
09	Improper Use of Catalog Components	A B	DC AB	2 4	4.3.2 Part II
10	Anchor Bolts	A B C D	AMA AMA AMA, DC AB	7 11* 4	Part II Part II
11	Longitudinal Loads on Transverse Supports		AMA	2	App.A
12	Hilti-Kwik Bolt Substitutions		AB	4	Part II
13	Substitution of Smaller Conduits on CA-Type Supports		AB,AMA	4	Part II
14	Use of CA-Type Supports in LS Span	s -	AB,AMA	4	Part II
15	Stresses in Cable Trays Due to Attached Conduit Supports		AMA	2 10	4.1.1 3.2.3e
16	Increases in Allowable Span Lengths		AMA		

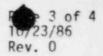
ISSUE CATEGORY LEGEND

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^{**}Reference under development



TEXAS UTILITIES NERATING COMPANY COMANCHE PEAK STEAM ELECTRIC STATION IMPELL EVALUATION AND RESOLUTION OF CYGNA TRAIN A AND B CONDUIT ISSUES AS APPLICABLE TO TRAIN C CONDUIT SUPPORTS SUMMARY MATRIX

APPENDIX NUMBER	GENERIC TECHNICAL ISSUE TITLE	SUB-ISSUE DESIGNATION	GENERAL ISSUE CATEGORY	IMPELL ISSUE RESOLUTION	
				REFERENCE*	SECTION
17	Substitution of Next Heavier Structural Member	-	AMA, AB	4	Part II
18 C1	Clamp Usage	Α	AB	12 13	
		B	AB AB	4 4	Part II Part II
19	Documentation Deviations Between Inspection Reports, CMC's and IN-FP Drawings	A B	DOCC		
20	Nelson Studs		DC, AMA	**	
21	Conduit Fire Protection Calculations	A B C D	AB AB DC,AMA AB	4 4 4	Part II Part II Part II Part II
22	Span Increase for Fire Protected Spans		DC	-	
23	Grouted Penetrations	***	DC,AMA	2	App. F

ISSUE CATEGORY LEGEND

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^{**}Reference under development

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TEXAS UTILITIES PERATING COMPANY COMANCHE PEAK STEAM ELECTRIC STATION IMPELL EVALUATION AND RESOLUTION OF CYGNA TRAIN A AND B CONDUIT ISSUES AS APPLICABLE TO TRAIN C CONDUIT SUPPORTS SUMMARY MATRIX

APPENDIX NUMBER	GENERIC TECHNICAL ISSUE TITLE	SUB-ISSUE DESIGNATION	GENERAL ISSUE CATEGORY	IMPELL ISSUE RESOLUTION	
				REFERENCE*	SECTION
24	Rigidity of CA-Type Supports	- "	AMA	2	App. D
25	Enveloping Configurations for Design		AMA, AB	4	Part II
26	Design Drawing Discrepancies	-	DOCC		
27	Walkdown Discrepancies	A B C	AB AB AB	4 4 4	Part II Part I Part I Part I
		E	AB AB	4	Part I Part I
28	Systems Concept	-	AMA	8 6 2	Ann P
29	Cumulative Effect of Review Issues		AMA,DC, DOCC,AB	-	App. B

ISSUE CATEGORY LEGEND

AMA - Analysis Methods & Assumptions

DC - Design Criteria

DOCC - Design Document Control AB - As-Built vs. As-Designed *Reference numbers refer to Section V of the Impell Train C Cygna Issue report

**Reference under development



October 22, 1986 IM-T-0210-052-148

Texas Utilities Generating Company Skyway Tower, L. B. 81 400 North Olive Street Dallas, Texas 75201

ATTENTION: Mr. William G. Counsi!

SUBJECT: Texas Uti

Texas Utilities Generating Company Comanche Peak Steam Electric Station "Generic Technical Issues Report-

Evaluation and Resolution of CYGNA Train A and B

Issues as applicable to Train C Conduit Supports", Impell Report No. 01-0210-1523

Gentlemen:

Per Mr. Scott Harrison's request, we are enclosing fifty (50) separately packaged copies of the subject report and other documents referenced in the subject report. These documents include the following:

- 1 Letter No. 84056-095 from N. H. Williams (Cygna) to W. G. Counsil (TUGCo) dated November 26, 1985, Subject: Review Issues List (RIL), Texas Utilities Generating Company, Comanche Peak Steam Electric Station, Independent Assessment Program All Phases.
- 2 Impell Project Instruction "Seismic Evaluation of Train C Supports", Project Instruction No. 0210-052-003, keyision 1, Job No. 0210-052-1355, Impell Corporation, Walnut Creek, CA 1986.
- 3 Impell Calculation No. ROTC-06, "Multi-Mode Factor Evaluation - Train C Conduit", Revision 1, Job No. 0210-052-1355.
- 4 Impell Project Instruction "Multi-Level Screening Criteria for Train C Conduit (Two Inch and Under) at Comanche Peak Steam Electric Station", Project Instruction No. 0210-053-001, Revision 5, Job No. 0210-053-1355, Impell Corporation, Walnut Creek, CA, 1986.

Mr. W. G. Counsil October 22, 1986 Page Two

- 5 "Test Report for Static Testing of Train C Beam Clamps and Unistrut Hangers for CPSES", CQL Report No. A-720-86, July 10, 1986.
- 6 Impell Calculation No. ROTC-02, "Prying Factors," Revision 0, Job No. 0210-052-1355.
- 7 Impell Project Instruction "Rigorous Analysis of Train C Conduit", Project Instruction No. 0210-052-006, Revision 1, Job No. 0210-052-1355.
- 8 Impell Report No. 01-0210-1479, Rev. 1, "Comanche Peak Steam Electric Station, Train C Conduit Two Inch and Under Criteria Document, "June, 1986.
- 9 Impell Project Instruction, "Dynamic Analysis of Cable Tray Systems", Project Instruction No. PI-02, Revision 4, Job No. 0210-040.
- "Test Plan Dynamic Testing of Typical Cable Tray Support Configurations", Document No. A-000150 Rev. 1, December 1986 by ANCO Testing Laboratory.
- 11 Impell Special Study No. 5.9, "Oversize Bolt Holes", Preliminary Issue.

If you have any questions, please call me.

Very truly yours,

Kevin C. Warapius

Project Manager

KCW/MSS/sp

Enclosure

Mr. J. E. Krechting
Mr. O. W. Lowe
Mr. L. D. Nace

Mr. H. A. Harrison

Mr. S. Harrison ARMS, TUGCo Repost