TU ELECTRIC

Log # TXX-6526
File # 10110
907.3
Ref # 10CFR50.55(e)

July 1, 1987

William G. Counsil
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
CONTROL VALVE BRACKETS
SDAR: CP-83-08 (INTERIM REPORT)

Gentlemen:

On March 24, 1983, we verbally notified your Mr. R. G. Taylor of a potentially reportable item involving welding of brackets on vendor supplied valves. This item was determined to be reportable via TXX-3657, dated April 21, 1983. Our latest reports were logged TXX-6222, TXX-6324, and TXX-6435, dated February 18, 1987, March 27, 1987, and May 13, 1987, respectively. These last two reports address this issue as related to a deviation (445/8607-D-01) identified in the NRC Inspection Report Nos. 50-445/86-07 and 50-446/86-05.

Our report dated April 21, 1983, identified two deficient items. The first item dealt with the issue of the code boundary of the brackets welded to the valve operators. We previously stated that the brackets were considered to be an integral part of an intervening element in which the pressure boundary integrity must be assured.

Subsequent evaluations indicate the seismic restraints do not provide support for the ASME III Piping System. The purpose of these supports is to restrain the seismic motion of the valve operators. Although the restraints are ASME-NF certified, it is not required by design that they be part of the ASME III Certified System. As the valve skirt and clip are not part of the NPV-1 component certified by Fisher Control, the restraints are not to be included in the ASME N-5 certified boundary.

The second item dealt with the quality of the bracket-to-actuator barrel weld with regard to the component pressure boundary integrity. As the boundary definition above places the brackets' weld outside the component pressure boundary the question dealing with the lack of documentation regarding weld acceptability can be addressed by the following explanation.

IE27
1/0

The clip material was procured by Fisher Control in accordance with their QA Program. The welding of the clips to the skirt was performed by qualified welders to qualified welding procedures, with qualified filler material and in accordance with the Fisher Control QA Program (for ASME Section IX). The welds were inspected per the Fisher Control QA Program and released under the Vendor Control Program. Compliance with the requirements of the component design specification, and seismic qualification was certified by Fisher Control.

A seismic event would not affect the integrity of the ASME piping system since the brackets' welds are certified to be adequate under seismic design loads as documented in Fisher's seismic qualification report.

Based on the above, we are re-evaluating our commitment to replace the subject brackets. To ensure the brackets' welds are acceptable we have decided to review Fisher Control's Certificates of Conformance (C of C's) and inspect the bracket attachment welds in accordance with the visual weld acceptance criteria (VWAC) and the weld sizes as depicted on the vendor's design drawings.

We will submit our next report by January 14, 1988.

Very truly yours,

W. G. Counsil

W. G. Counsil

By: G. S. Keeley

G. S. Keeley
Manager, Nuclear Licensing

JCH/dl

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