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September 5, 1989

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

SUBJECT: COMANCHF PEAK STEAM ELECTRIC STATION (CPSES) DOCKET NOS. 50-445 AND 50-446 INSTRUMENTATION INSTALLATIONS SDAR: CP-86-19 (SUPPLEMENTAL REPORT)

REF: SDAR: CP-86-050, "UNISTRUT SPRING NUTS ON INSTRUMENT SUPPORTS" SDAR: CP-86-070, "ELEVATED TEMPERATURE EFFECTS ON TUBING"

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On January 29, 1988, TU Electric notified the NRC by final report TXX-88146 of deficiencies involving instrument installations. The last report on this issue was logged TXX-89367, dated June 2, 1989. As noted in TXX-88146, the scope of SDAR CP-86-19 was expanded to envelope four other SDARs, including CP-86-50, "Unistrut Spring Nuts on Instrument Supports" and CP-86-70, "Elevated Temperature Effects on Tubing". The purpose of this report is to update the corrective action for SDARs CP-86-50 and CP-86-70 and to increase the scope of CP-86-50 to include a deficiency involving instrument spring nut thread engagement.

## Unistrut Spring Nuts on Instrument Supports (SDAR CP-86-50)

TXX-88146 addressed deficiencies concerning nut alignment and torque requirements for Unistrut spring nuts on instrument mounts. TXX-88146 stated that the drawings and specifications for instrument racks and instrument and tubing support details had been revised to incorporate specific torque values and spring nut alignment criteria. Although Unistrut spring nut torque and alignment criteria are included in some of those documents, the primary source of information is specification CPES-I-1018, "Installation of Piping/Tubing and Instrumentation." Since CPES-I-1018 adequately defines the Unistrut spring nut torque and alignment requirements, no further revision of the drawings, details or other specifications referred to in TXX-88146 is required.

Subsequent to identification of the above conditions, a deficiency on the installation of Unistrut spring nuts was identified during implementation of ISAP VII.c involving inadequate thread engagement. Although a safety significance evaluation was not performed, this condition was identified as an unclassified deviation in ISAP VII.c and consequently is being conservatively treated as a construction deficiency included in the scope of this SDAR.

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The deficiency results from lack of adequate inspection criteria and failure to properly implement initial criteria.

To correct the thread engagement deficiency, specific criteria have been incorporated as required inspection attributes into the installation specification and into the appropriate Construction and QA procedures. Construction and QC personnel have been retrained as required. A reinspection of Unit 1 and Common Unistrut spring nuts is in progress. Any Unistrut spring nuts determined to have inadequate thread engagement will be reworked to comply with the inspection criteria.

The reinspection and rework of Unit 1 and Common Unistrut spring nut thread engagement will be completed prior to Unit 1 fuel load. The required Unit 2 corrective action will be completed prior to Unit 2 fuel load.

## Elevated Temperature Effects on Tubing (SDAR CP-86-70)

TXX-88146 stated that Engineering Evaluation Report No. 01-0210-1064, Rev. 4 documented recently completed tests and calculation results which confirm that the elevated temperature effects of a HELB or LOCA on instrument tubing are adequately accounted for in the methodology and conservatisms of existing design criteria. However, the Engineering Evaluation Report does not address testing. Further, no testing was performed. The reference to tests in the above statement from TXX-88146 was an inadvertent error. The acceptability of the design for elevated temperature condition is based on engineering analysis. No testing is required for this item.

Sincerely,

William J. Cahill.

RMR/vld

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