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Ref. #10CFR50.55a(g)(5)(iii)

CPSES-200001960
Log # TXX-00151
File # 10010.1
905.2 (clo)

August 10, 2000

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
(1986 EDITION OF ASME CODE, SECTION XI, NO ADDENDA;
UNIT 2 INTERVAL DATES: AUGUST 3, 1993 - AUGUST 3, 2003,
FIRST INTERVAL)

REF: TXU Electric letter logged TXX-00087 dated April 19, 2000 to the NRC

This transmittal amends the previously submitted relief request D-1 and E-2 via the above referenced letter. The revisions to the previous letter are clearly identified via vertical lines in the right hand margin.

A047

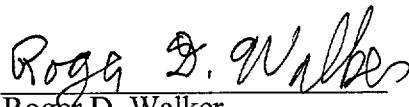
TXX-00151

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There are no new licensing based commitments in the communication. Should you have additional questions, please contact Obaid Bhatti at 254-897-5839.

Sincerely,

C. L. Terry

By: 
Roger D. Walker
Regulatory Affairs Manager

OAB/oab

Attachments

cc: E. W. Merschoff, Region IV
J. I. Tapia, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES
G. Bynog, TDLR

**CPSES UNIT 2
RELIEF REQUEST
D-1**

A. Item(s) for which relief is requested:

Component Cooling Water (CCW) System component supports
Tag No.'s: CC-2-155-408-S53R and CC-2-159-409-S53R

B. Item(s) Code Class:

3

C. Examination requirement from which relief is requested:

The requirement for visual examination of 100% of the weld length as described in Table IWD-2500-1, Examination Category D-A , Item No. D1.20.

D. Basis for relief:

Bolted pipe chase covers prevent access to the integral welded attachments for these two component supports and therefore preclude the visual examination of the weld surface required by Fig. IWD-2500-1. Administrative controls and barriers restrict access to the pipe chases due to high radiation levels and confined space designation. Relief is being requested for the integral welded attachments for two component supports which represent less than one percent of the total number of component supports with integral welded attachments in the plant. More than 53 percent of these welded attachments have been examined to date. No unacceptable conditions have been identified on any of these previously examined items. The damage mechanisms associated with welded attachments would typically result from piping system transients that would also affect the component supports immediately adjacent to these inaccessible supports. The immediately adjacent component supports of similar type, design and function on the same pipe lines and the remaining 68 integral welded attachments in the CCW system are not covered and are accessible for the required examination. The bolted pipe chase covers will be removed if conditions exist in the accessible areas that could indicate the integrity of the integral welded attachments on the two inaccessible component supports are suspect for continued service. Therefore, there are no additional safety benefits to be gained by examining these inaccessible welded attachments.

A total of 200 man-hours will be required to perform this activity. The radiation exposure hazards are not certain because no access has been provided to these areas to obtain survey data. However, these areas do contain CVCS letdown piping, which in accessible areas have developed hot spots / pipes with dose rates up to 2 R/hr, with 12" readings up to 700 mR/hr. There is a high probability for the sections of piping containing the welded attachments in these pipe chases to have similar or higher dose rates associated with them. The extensive craft, radiation protection and safety department support for scaffolding, rigging, plate removal, confined space entry, radiological surveys and plate reinstallation that would be required if the bolted pipe chase covers for these 2 component supports are removed would not be compensated for by an increase in the level of plant quality and safety.

E. Alternate examinations:

None

F. Anticipated impact on the overall level of plant quality and safety:

None

**CPSES UNIT 2
RELIEF REQUEST
E-2**

A. Item(s) for which relief is requested:

Electrical Penetration No.'s:

2-E-0006, 0009, 0015, 0016, 0018, 0039, 0040, 0045, 0056, 0060, and 0066.

B. Item(s) Code Class:

MC

C. Examination requirement from which relief is requested:

The requirement for visual examination of 100% of the containment surface areas as described in Table IWE-2500-1, Examination Category E-A, Item No. E1.11 of the 1998 Edition of ASME Section XI, Subsection IWE per CPSES Relief Request E-1.

D. Basis for relief:

The surfaces of these 11 electrical penetrations are covered with radiant energy shield (RES) material which precludes the general visual examination of the surface required by Table IWE-2500-1, Examination Category E-A, Item No. E1.11. This RES material is designed for post fire safe shutdown protection. RES is made from a custom sewn ceramic fiber blanket in a fireproof fabric envelope which is banded in place and is not designed for removal and reinstallation. The construction of the RES is such that, if damaged, the fibrous material can create excessive waste, and will require additional attention to prevent sump clogging. The metal containment liner surfaces, including all mechanical penetrations and the remaining 64 electrical penetrations are not covered and are accessible for the required examination. An evaluation of these covered penetrations will be performed and the RES will be removed if conditions exist in accessible areas that could indicate degradation could also exist or could have extended into the RES covered areas. This relief is being requested for 11 electrical penetration which are all of stainless steel construction and represent less than 1 percent of the total IWE metal containment surface area. More than 90 percent of the containment surface area has been examined to date. The previously examined mechanical penetration assemblies and the containment liner are of carbon steel construction and are more susceptible to corrosion type damage mechanisms. No matters of concern with respect to any damage mechanism were identified. TXU Electric has adequate confidence that these stainless steel surfaces are not susceptible to the damage mechanisms that may affect the carbon

steel surfaces. Therefore, there are no additional safety benefits in examining these penetration surfaces.

A total of 1200 man-hours will be required to perform this activity. The radiation exposure is expected to exceed 3.5 man-Rem. The extensive craft and radiation protection support for scaffolding, RES material removal, repair or replacement of damaged RES material and RES material reinstallation that would be required if the RES wrapping on these 11 electrical penetrations is removed would not be compensated for by an increase in the level of plant quality and safety.

E. Alternate examinations:
None

F. Anticipated impact on the overall level of plant quality and safety:
None