

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER - DALLAS, TEXAS 75201

R. J. GARY  
EXECUTIVE VICE PRESIDENT  
AND GENERAL MANAGER

October 11, 1979

Mr. Robert L. Baer  
Chief  
Light Water Reactors Branch No. 2  
Division of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
SAFETY-RELATED PROCESS INSTRUMENTATION  
TUBING MOUNTING  
DOCKET NOS. 50-445 AND 50-446  
REFERENCE: APPLICANT'S LETTER TO BAER DATED  
AUGUST 28, 1979

Dear Mr. Baer:

Subsequent to my letter to you dated August 28, 1979, there were several telephone conversations between your staff and our engineering group which clarified the design provisions. The following documents this clarification and supercedes my previous letter.

In the course of designing and constructing Comanche Peak Steam Electric Station (CPSES), it has been identified that there is a lack of regulatory or industry guidance on safety-related process instrumentation tubing mounting and code applicability. Further, a description of the methods handling this equipment is not required in Regulatory Guide I-70 "Standard Format and Content for Safety Analysis" in the Standard Review Plans. In light of this situation, Texas Utilities Generating Company (TUGCO) wishes to inform the Staff that the following approach is being taken on CPSES:

1. All ASME Class 2 or 3 tubing connecting process instruments to ASME III Class 2 and 3 piping are being seismically supported.

NOTE: The CPSES design does not include any ASME III, Class 1 process instrument tubing.

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2. All ASME Class 2 or 3 tubing connecting safety-related process instruments to non-ASME III HVAC piping or duct work are being seismically supported.
3. All instrument tubing, valves and fittings forming ASME III Class 2 or 3 pressure boundaries will be purchased, installed and tested in accordance with the requirements of ASME III Class 2 or 3 and will be supported as described in 6. below.
4. The seismic tubing support design considers movements of the connecting piping in relation to the tubing.
5. Any welding of non-NF seismic tubing supports is per AWS specification consistent with that performed on other safety-related, non-ASME supports.
6. The boundary of jurisdiction of ASME code section III, Class 2 or 3 tubing extends to the instrument. In lieu of ASME subsection NF, seismically qualified support systems may be employed for process instrument tubing from the instrument root valve to the instrument. Subsection NF supports will be employed to the instrument root valve.
7. The Quality Assurance program governing non-NF supports is the NRC approved QA program governing non-ASME work which meets the requirements of Appendix B to 10CFR Part 50.
8. The material used for fabrication of non-NF seismic instrument tubing supports is purchased with certificates of compliance to applicable ASTM standards.
9. Existing seismically designed support systems such as cable tray hangers or conduit supports may be used for tubing supports as permitted by 6. above. Any necessary re-analysis will be performed to justify the additional loads.

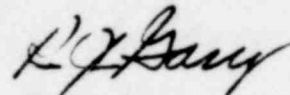
TUGCO believes this approach is consistent with the need to ensure the integrity of the instrumentation tubing for safety applications to protect the health and safety of the public. This information will be included in a future amendment to the FSAR.

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The above procedure for handling safety-related process instrumentation tubing mounting is being forwarded for your review and concurrence. Your expeditious response in this matter is requested.

Sincerely yours,



R. J. Gary

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