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December 29, 1989

William J. Cahill, Jr.
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
ENVIRONMENTAL QUALIFICATION (EQ) COMMITMENTS
INSPECTION REPORT (IR) (50-445, 446/89-60)

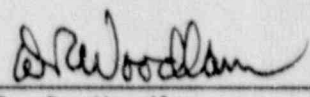
Gentlemen:

TU Electric has completed its review of the commitments described in Appendix B of IR 50-445, 446/89-60, dated November 22, 1989. The attachment to this letter provides formal notification of TU Electric's concurrence to the above commitments, as listed. Note that additional information has been provided to clarify and describe the resolution of the Open Item commitments.

If there are any questions please contact Veronica Cornell at (214) 812-8886.

Sincerely,

William J. Cahill, Jr.

By: 
D. R. Woodlan
Docket Licensing Manager

VPC/smp
Attachment

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

9001050250 891229
PDR ADOCK 05000445
Q: FIC

Environmental Qualification Inspection Report,
(50-445, 446/89-60), dated November 22, 1989
Commitments

TU Electric concurs with the following commitments.

1. Update the FSAR prior to Unit 1 fuel load regarding "exact replacement" definition.
2. Update FSAR prior to Unit 1 fuel load to reflect the location of EQ environmental data (i.e. Table 4-1, Figure 4-1 and Figure 4-2).
3. Certify the completion of the EQ program as required by SSER 19, including certification that the following items are complete.
 - SDAR 87-132; Limitorque Motor Operated Valve Actuators
 - DMRC 89-1-075; Failure of Power Supplies to safety-related monitor light boxes due to flooding caused by a HELB
 - SDAR 87-133; HELB Calculations
 - STIR-CPRT-E-003; Heat Shrinkable Sleeve Installations
 - NCR's 89-04197, -04214, -04213, 04200 and 04198; "T" Drains in Limitorque Motor Valve Operators
 - NCR 89-8906; Motor Leads in Limitorque Motor Valve Operator
 - PIR 89-219, WR 62209 and WR 62210; ASCO Solenoid Valves

In addition, the following clarification is being provided regarding the commitment for the Open Item 50-445,446/8960-0-01.

Per Sec. 4.1.1 of the Inspection Report, it was committed that "EQ program personnel would review all vendor recommendations with respect to EQ related equipment."

The intent of the statement is correct. It was understood that fulfillment of this commitment would entail review of vendor qualification test reports for implementation of vendor "recommended" maintenance in the CPSES Preventive Maintenance unless otherwise justified.

In Sec. 5.1 the report reads in part:

"The inspectors consider the Inspection Open Item of paragraph 4.1.1 to be applicable to the Mild environment electrical equipment also."

For electrical equipment located in mild environments at CPSES, qualification data packages have been established which support the design lives of equipment. The design lives are based on manufacturers' ratings, vendors' design or application analyses, testing or engineering analyses for the specific environment and are hence very conservative. Moreover the Preventive Maintenance program supports and maintains the qualification of this equipment.

In Section 6.0 the report reads in part:

"The inspectors determined that the mechanical equipment is included in the equipment qualification maintenance program and by that fact the Inspection Open Item of paragraph 4.1.1 is applicable to this equipment also."

Vendor qualification test reports are seldom available for mechanical equipment. The qualification of mechanical equipment is primarily based on rigorous analyses of the aging parameters for the age sensitive nonmetallic materials in the equipment. The design, specification, procurement, and quality assurance procedures are supplemented by the Preventive Maintenance program, the Surveillance and Maintenance program and the Pump and Valve Operability programs to provide reasonable assurance for the proper maintenance of the qualification of the mechanical equipment.

Based on the clarification stated above, TU Electric assures that vendor qualification test reports for all electrical equipment located in harsh environments at CPSES shall be reviewed prior to the first refueling outage. It is also clarified that this review shall be performed by Engineering personnel which encompasses EQ program personnel, Equipment/Systems Engineers and Operations Personnel.

ALL

W. G. Counsil
 L. D. Nace
 M. D. Spence/
 J. D. Redding
 W. J. Cahill

 R. D. Walker/
 J. S. Marshall
 J. E. Krechting
 W. G. Guldemon

 R. A. Wooldridge
 R. M. Fillmore
 T. M. Wilson

 R. L. Ramsey

 H. C. Schmidt
 T. Sprinkle
 J. J. Allen
 J. L. French

 ARMS

BY SUBJECT

~~H. D. Bruner~~
~~D. M. Reynerson~~
 T. E. Redican (NODIL)

 C. B. Hogg

~~D. P. Berry~~
~~J. T. Conly~~
 J. W. Muffett
 P. B. Stevens
 O. W. Lowe

 A. B. Scott
 J. J. Kelley
 M. R. Blevins
 M. J. Riggs (IOER)
~~J. F. McMahon~~
~~R. J. Daly~~
 C. L. Terry

 R. G. Spangler/
 J. W. Beck

~~A. Hussain~~

 D. R. Woodlan
~~R. P. Baker~~
 J. C. Hicks

 J. F. Streeter (IOER)
~~D. M. McAfee~~
~~P. E. Halstead~~
~~D. E. Deviney~~

~~J. D. Edwards~~
 J. L. Barker (ISEG)

 T. G. Tyler

DOCKETED

J. Ellis (CASE)
 J. L. Vota
 N. S. Reynolds
 F. A. Camp
 L. Kennedy

IAP, ASLB & CAP
~~S. D. Karpayak~~
~~N. H. Williams~~

SDAR
~~L. W. Sluiter~~
~~C. B. Corbin~~
INPO
~~G. Byrrog~~

CPSES IR
 R. A. Werner
 J. Smith
~~G. Maynard (NOV only)~~

 TXX File (Corp.)
 TXX File (Site)
 TXX File (Bethesda)

OTHER

G. W. Walcott (Unit 2)
~~W. L. Stendebach (ORC)~~
~~S. S. Palmer~~
 (Stipulation Related)

Mitch Lucas

NODIL - Correspondence related to material/component acceptability.

IOER - Correspondence which pertains to IOER program (e.g., generic letters, NRC information notices, NRC bulletins, etc.) and CPSES Inspection Reports.

CASE - All filings and correspondence between the NRC staff and TU Electric.

ORC - All SDAR's, CPSES Inspection Reports and responses, and Generic Letters.

ISEG - All IOER material plus inspection reports for TU Electric and other plants.

November 28, 1989