

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER - DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

July 1, 1981
TX-3358



Mr. G. L. Madsen, Chief
Reactor Projects Branch
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76012

Docket Nos. 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
SEISMIC INSTRUMENT TUBING SUPPORT
FILE NO: 10110

Dear Mr. Madsen:

In accordance with 10 CFR 50.55(e), we are submitting the attached report of actions taken to correct a deficiency regarding inadequate seismic instrument tubing supports. We previously made a verbal report to your Mr. R. G. Taylor on June 4, 1981.

Supporting documentation is available at the CPSES site for your Inspector's review.

If we can provide any additional information, please advise.

Very truly yours,

R. J. Gary
R. J. Gary

RJG:kh
Attachment

cc: NRC Region IV - (0 + 1 copy)

Director, Inspection & Enforcement - (15 copies)
c/o Distribution Services Branch, DDC, ADM.
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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ATTACHMENT
SEISMIC INSTRUMENT TUBING SUPPORT

DESCRIPTION OF DEFICIENCY

Construction activities for Instrumentation and Control (I&C) are controlled at CPSES by packages 2323-I-001 and 2323-I-002, which are issued in accordance with established engineering procedures. The 2323-I-001 package consists of typical supports used to seismically support instrument tubing. The 2323-I-002 package provides guidelines for layout and support of instrument tubing. These packages were developed and implemented by CPPE based upon criteria and load conditions provided by a subtier design vendor - EDS Nuclear inc. (Report No. 01-0210-1065).

The vendor has stated loads provided by the report were the "maximum expected loads on tube supports....generated in worst case conditions." Upon further review of the criteria, the vendor has advised the criteria was provided based on an Operational Basis Event (OBE) in lieu of a Safe Shutdown Event (SSE).

Analysis of Safety Implications

Original loads, as specified by the vendor when applied to field installation, result in a maximum induced load per tube of 23 lbs. applied to any support at any location. Revised criteria (OBE to SSE), in conjunction with revised methodology for load application, increases maximum induced loading to 50 lbs. axial and 35 lbs. lateral. The result is that certain tubing supports for safety-related instrumentation could fail during a SSE.

Corrective Action

Corrective action for the subject deficiency will consist of evaluation and revision of engineering documents, a field survey of all completed installations, and disposition and rework of non-compliant conditions.

This evaluation will involve the determination by calculation of maximum induced loads derived from review of "worst case" conditions per the vendor's revised criteria. These calculations will be reviewed by the vendor. In addition, typical supports will be analyzed to determine maximum allowable loads. Using this data and revised vendor criteria, packages 2323-I-001 and -002 will be revised to properly reflect SSE load configurations. These actions will be controlled in accordance with established engineering procedures/instructions.

The survey will be performed jointly by CPPE and QC personnel using a detailed checklist and will address all completed installations. All nonconforming conditions will be controlled in accordance with established procedures for nonconforming items. The survey will commence upon the completion of criteria revision efforts and indoctrination of personnel. All nonconformances will be dispositioned accordingly.

The anticipated completion date for corrective actions is January 4, 1982.