

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER • DALLAS, TEXAS 75201

Log # TXX-3597
File # 10115

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

December 3, 1982

Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

RIV
Docket Nos. 50-445/IE Bulletin 79-14
50-446/IE Bulletin 79-14

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
1981-83 2300 MW INSTALLATION
IE BULLETIN 79-14

Dear Mr. Collins:

In compliance with NRC IE Bulletin 79-14, CPSES has initiated a program to insure that the as-built piping and support field conditions have been verified to be consistent with the latest seismic stress analysis. This letter will serve to formally respond to the Bulletin.

The scope of the program has been established based upon a detailed review of Bulletin requirements and studies initiated to identify applicable piping systems and related components along with the stress analysis problems associated with the subject piping. All related documents pertaining to each stress problem have been identified and the basis for the As-Built Verification Program is firmly established. The following defines the scope of the piping being as-built verified to satisfy requirements of the Bulletin:

<u>SAFETY CLASS</u>	<u>SIZE</u>
1	All sizes
2, 3	Large bore (2-1/2" and larger).
2, 3, 5	High energy lines over one inch that were computer analyzed.
2, 3, 5	Designated piping, regardless of size, (up to and including the first anchor or terminal connection) that interacts with safety-related large bore pipe.

Note: Class 5 piping has been defined as non-nuclear safety-related lines contained in Seismic Category I structures.

IE 11
1/0

Safety Class 2 and 3 small bore (2" and smaller) non-high energy lines (regardless of the analysis method used) have been excluded from the scope of the formal 79-14 verification program for the following reasons:

1. These lines are analyzed after the piping has been installed and the as-built configuration is known.
2. Support locations used in the analysis are field verified prior to completion of the analysis.
3. Deviations from the as-designed support locations are design reviewed and reconciled with the analysis.

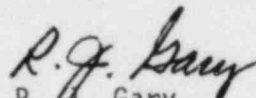
The verification process for a typical stress problem begins by assembling into a "package" all related documentation in the form of piping and support construction drawings, and support location isometrics. The documents are then field verified by site QA personnel. Items verified are piping configuration, pipe support location and function, clearances between pipe and support, valve operator orientation, and any other information necessary to perform the stress analysis. Valve weights were previously verified in the CPSES Valve Weighting Program and this information is included in the document package. The as-built verified information is forwarded to the analysis organizations for final code analysis and piping certification.

NOTE: A stress problem is defined as a stress analysis of a piping system or subsystem whose boundaries are defined by the existence of a fabricated anchor, simulated anchor (equipment nozzle, containment penetration), or a system of supports.

In conclusion, we are confident that the ongoing As-Built Verification Program at CPSES fully satisfies all Bulletin requirements.

Please contact this office if additional information or clarification can be provided.

Sincerely,


R. J. Gary

RJG:grr

cc: U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, D.C. 20555