

TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER • DALLAS, TEXAS 75201

Log # TXX-3641

File # 905.4

March 10, 1983

Mr. S. B. Burwell  
Licensing Project Manager  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

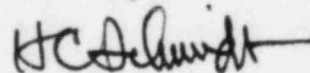
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
PRESERVICE INSPECTION PLAN UPDATE

Dear Mr. Burwell:

Enclosed please find 3 copies of relief requests B-1, B-14, C-4 and D-2 which are to be included as part of the previously transmitted CPSES Preservice Inspection Plan. Copies of these relief requests are also being sent to the CPSES resident inspector and Tom Taylor at Battelle Pacific Northwest Laboratories.

Should you have any questions concerning this matter please contact me directly.

Sincerely,



H. C. Schmidt

BSD:tls  
Enclosure

c - Robert Taylor  
Tom Taylor

13001

RELIEF REQUEST B-1

Component: Pump Casings & Valve Bodies >4"  
Category B-L-2 & B-M-2

Code Class: 1

Examination Requirements:

VT-3 Pump Casings & Valve Bodies exceeding 4 inch nominal pipe size.

Basis for Relief:

The casings and bodies were visually inspected as part of the manufacturing process, but the inspections were not documented in accordance with Section XI requirements. Liquid Penetrant examination was also performed on the components. Disassembly of Pumps and Valves at this time would not be practical.

Alternative Examination:

Manufacturer records will be used in the as recorded condition. Records will be maintained at the manufacturers facility.

RELIEF REQUEST B-14

Component: Steam Generator R.C. Nozzles  
Pressurizer, Spray, Safety, Relief  
and Surge Nozzle Inner Radius  
Section

CODE CLASS: 1

Examination Requirement:

Table IWB-2500-1 Category B-D requires volumetric examination of the nozzle inside radius section.

Basis for Relief:

The configuration of the nozzle to vessel at the inner radius section prevents meaningful volumetric examination. Practical alternative techniques to volumetrically examining the inner radius section which would produce meaningful results are not presently available.

Alternative Examination:

A visual examination of the inner radius section will be performed only if the Steam Generators and Pressurizer are opened for other types of examinations or for maintenance purposes.

The surge nozzle inner radius section is not accessible due to the heaters connected inside the bottom head.

## RELIEF REQUEST C-4

Component: Steam Generator

CODE CLASS: 2

### 32" Main Steam Nozzle Inside Radius Section

18" Feedwater Nozzle Inside Radius Section

**Examination Requirement:**

Table IWC-2500-1 Category C-B requires volumetric examination of the nozzle inside radius section on nozzles >12 in. NPS (Ref. Fig. IWC-2500-4).

**Basis for Relief:**

The configuration of the nozzle to vessel at the inner radius section prevents meaningful volumetric examination. Practical alternative techniques to volumetrically examining results are not presently available.

Alternative Examination:

A visual examination of the inner radius section will be performed only if the steam generators are opened for other types of examinations or for maintenance purposes.

RELIEF REQUEST D-2

Component: Mechanical Snubbers

Code Class: 1, 2, 3  
and BOP

Examination Requirement:

IWF-5200 preservice tests conducted at the manufacturers facilities.  
IWA-6210(b) "The Owner shall prepare records of the examinations,  
tests, replacements, and repairs.

Basis for Relief:

- (1) A certified letter from the manufacturer serves the same purpose as having the test records on site.
- (2) Snubbers are tested periodically inservice and the results of the "inservice test" only determines acceptability of the snubber.
- (3) Obtaining the manufacturers records would cause an undue burden on the Owner due to the cost of obtaining these records.
- (4) The supplier is obligated by contract to maintain the records for all snubbers tested.

Alternative Examination:

The records of the preservice tests conducted at the manufacturers facilities will be a listing by serial number of all snubbers tested together with a certified letter from the manufacturer stating that the listed snubbers were tested and are acceptable in accordance with IWF-5200. This record will be maintained in accordance with IWA-6310.