



TU ELECTRIC

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April 23, 1991

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Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) UNIT 2
DOCKET NO. 50-446
SEISMIC CATEGORY II INSTALLATIONS

Gentlemen:

This letter describes the verification and inspection process at CPSES Unit 2 for the types of new and modified Seismic Category II installations that were individually inspected by Quality Control (QC) on Unit 1.

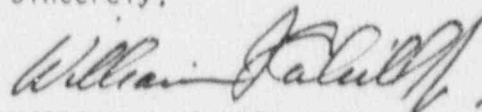
For Unit 2, appropriately trained and qualified Construction Engineers (CE's) verify the adequacy of new or modified Seismic Category II installations. The CE's that perform the verifications are qualified by a combination of education, experience, and completion of training for their specific area of responsibility. The CE verification results are documented in accordance with the governing procedures for the activity. After the CE verification and prior to final QC acceptance, QC inspects a representative number of commodities from a lot (as specified by criteria in the governing procedure) and documents the results on QC inspection reports.

The acceptance/rejection of a lot is determined by the criteria in the governing procedure. When QC inspection results are acceptable, the lot as a whole is considered "final QC accepted" and the records are placed in the vault. If the QC inspection results are not acceptable, additional commodities within the lot are chosen for inspection as prescribed by the governing procedure. In the event that adverse trends are noted, a TU Evaluation (TUE) Form is generated to document a programmatic/repetitive condition which requires evaluation beyond that required for individual nonconformances or deficiencies.

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These provisions are consistent with TU Electric commitments in Chapter 17 of the Final Safety Analysis Report (as they relate to construction activities) which provide the necessary assurance of quality while satisfying applicable regulatory requirements. The entire process is subject to surveillances and/or audits by the TU Electric Quality Assurance Department. The QC inspection results on safety-related applications to date have shown that CE verifications, prior to turnover to QC, provide a high level of confidence in the adequacy of installed hardware.

Sincerely,



William J. Cahill, Jr.

CBC/daj

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