

**TU**ELECTRIC

Log # TXX-91222

File # 10110

903.9

Ref. # 10CFR50.55(e)

June 14, 1991

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)-UNIT 2  
DOCKET NO. 70-446  
CLASS 5 PIPE SUPPORTS  
SDAR: CP-87-062 (SUPPLEMENTAL REPORT)

Ref: TU Electric letter from William J. Cahill to  
NRC dated September 7, 1989, TXX-89651

Gentlemen:

On August 24, 1987, TU Electric orally notified the NRC of deficiencies in the use of nomographs to design seismically supported Class 5 large bore piping systems. The final report on this issue was provided by the referenced letter. The final report described a program to demonstrate the adequacy of large bore non-nuclear non-ASME Class 5 piping systems in Unit 1. This program applies earthquake experience to assess the integrity of Class 5 piping systems during the most severe postulated seismic event. This program was extensively reviewed by the NRC with results documented in Inspection Report 445/9003. In the referenced letter, TU Electric indicated that the corrective action required for Unit 2 would be assessed upon resumption of the balance of Unit 2 engineering activities.

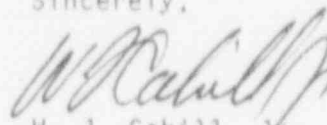
The corrective actions stated in the referenced letter will also be applied to Unit 2. In summary, the objective of the program is to demonstrate the adequacy of Class 5 pipe supports by selecting a bounding sample consisting of the least conservative seismic design configurations and proving the acceptability of those configurations by analysis. The walkdowns and analyses will be completed prior to Unit 2 fuel load.

TE27

TXX-91222  
Page 2 of 2

TU Electric has taken action to preclude recurrence of this deficiency. Changes have been made to the applicable Design Basis Document to require that nomographs be utilized only in accordance with approved engineering procedures. These procedures contain specific criteria for use of nomographs including the limitations and exclusions on when such methods are not appropriate.

Sincerely,



W. J. Cahill, Jr.

HAM/gj

cc: Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (2)  
Mr. M. Fields, NRR