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William J. Cahill, Jr.
Executive Vice President

April 8, 1991

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
CABLE TRAY TRANSVERSE CLAMPS
SDAR: CP-87-48 (SUPPLEMENTAL REPORT)

Gentlemen:

On August 21, 1987, we notified you by our letter, logged TXX-6658, of a deficiency which we deemed reportable under the provisions of 10CFR50.55(e) involving the mixing of different types of transverse clamps on ladder type cable trays. Engineering review identified a few installations where inside transverse clamps (type "C") existed on one side of the cable tray and outside transverse clamps (types "A" or "G") existed on the opposite side. A review of installation drawings, procedures and specifications revealed that the requirements were not clear with regard to the mixing of clamps. These combinations could have resulted in the unevaluated transverse movement of cable trays containing safety related cables during a postulated seismic event. This letter addresses the Unit 2 corrective and preventive actions to resolve this issue.

For Unit 2, the approach for resolving design concerns on cable tray hangers began in early 1985. Due to the status of Unit 2 construction completion, it was determined at that time that a complete re-design of cable tray hangers would be performed in lieu of confirming the adequacy of existing installations. Unambiguous clamp requirements were established in Unit 2 design criteria, design basis documents, installation specifications, and Construction/Quality Control procedures. For installations which existed at that time, the process began with the creation of cable tray hangers as-builts which showed the cable tray clamp combinations. Using the as-builts, a calculation, which also reflected any required modifications, was generated

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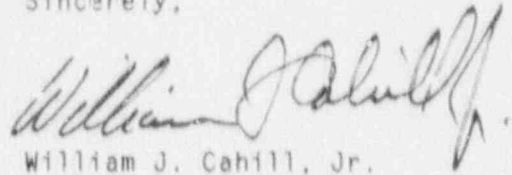
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for each cable tray hanger. Design validated individual support drawings, which clearly depicted proper clamp configurations, were then issued to construction and the clamps were subsequently inspected to the drawing requirements.

New installations are controlled using the validated design and installation requirements which preclude the mixing of tranverse clamps.

The re-design process described above has not been completed for all cable tray clamps. The criteria and corrective actions for resolving this issue are included as part of the resolution of all cable tray hanger design concerns. Resolution will be accomplished as part of the corrective actions for SDAR-CP-85-35 "Cable Tray Hanger Design". No further reports are planned for SDAR-CP-87-48.

Sincerely,

A handwritten signature in dark ink, appearing to read "William J. Cahill, Jr.", with a stylized flourish at the end.

William J. Cahill, Jr.

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cc: R. D. Martin, Region IV
M. B. Fields, NRR
Resident Inspectors, CPSES (3)