



**TU**ELECTRIC

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Ref. # 10CFR50.55(e)

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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 SYSTEMS AND COMPONENTS  
SDAR: CP-86-45 (SUPPLEMENTAL REPORT)

Gentlemen:

On June 6, 1986, TU Electric orally notified the NRC of a deficiency involving the potential for interaction between Non-Category I equipment and components and Seismic Category I structures, systems and components. This deficiency was identified by an interdisciplinary design review of a Unit 1 proposed Design Change Authorization for a Seismic Category II handrail where the anchoring details were qualified but the integrity of the handrail structure itself was not considered. The purpose of this report is to address the methodologies, scope, and corrective actions to resolve this deficiency for Unit 2.

For Unit 1 and common, this deficiency was resolved by identifying Non-Category I sources which could potentially interact with safety targets, followed by evaluations of these sources and targets for acceptability using dynamic impact criteria per project procedures and Design Basis Documents. Interactions not resolved in this way were resolved by structural integrity evaluations of the Non-Category I sources. This evaluation used a combination of an established earthquake experience database, existing component seismic qualification records and anchorage design calculations.

For Unit 2, TU Electric will resolve this deficiency by implementing a seismic evaluation program similar to the Unit 1 approach for resolving SDAR CP-87-62 "Class 5 Pipe Supports". The objective of the program is to demonstrate the seismic integrity of existing Non-Category I installations in Seismic Category I buildings as described below. In a limited number of specific cases, source-target evaluations may be performed to confirm that unacceptable interactions will not occur.

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The seismic evaluation program consists of the following.

1. An area engineering walkdown is performed within Seismic Category I structures to identify potential source candidates for further evaluation. Engineering walkdowns are performed in accordance with project procedures which define the screening criteria for source commodities based on earthquake experience data, the Unit 1 program including Post Construction Hardware Validation Program (PCHVP) results and engineering experience.
2. Candidates identified during area walkdowns are evaluated specifically or by a bounding analysis for structural integrity.
3. Where structural integrity cannot be adequately demonstrated using specific evaluation or bounding analysis techniques, commodities will either be modified or justified as acceptable using source-target evaluation methods similar to those used in Unit 1.

New Unit Non-Category I commodities installed in the Unit 2 and Common Area will be required to maintain structural integrity for safe shutdown earthquake (SSE) loading. New Unit 2 Seismic Category I systems/components installed in the Unit 2 and Common Area will be evaluated to confirm that they will not be adversely affected by existing sources.

The Unit 2 seismic evaluation described above is also being utilized for the resolution of the Non-Category I portions of the following SDARs which are consolidated into the subject SDAR. (The Seismic Category I portions of these SDARs remain as stated in the previous correspondence for each issue).

SDAR CP-85-29 Design of Architectural Features  
(Lighting fixtures, speakers, horns, smoke detectors and anchorages of miscellaneous items as described in TXX-91283)

SDAR CP-85-34 Design of Conduit Supports  
(Train C > 2" including Junction Boxes)

SDAR CP-85-35 Design of Cable Tray Hangers (Train C)

SDAR CP-85-36 Train C Conduits 2 inch and less  
(including Junction Boxes)

SDAR CP-85-54 Seismic Qualification of HVAC Supports

SDAR CP-87-23 Loose Conduit Unions  
(including neo-weld, communications and security system conduits)

SDAR CP-87-68 Hilti Bolt Inadequacies

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The Unit 2 corrective actions will be completed prior to Unit 2 fuel loading.

Sincerely,

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