

TEXAS UTILITIES SERVICES INC.

2001 GRYAN TOWER-DALLAS, TEXAS 75201-3050

Log # TXX-3663

File # 905.4

May 6, 1983

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
PRESERVICE INSPECTION PLAN UPDATE

Dear Mr. Burwell:

Enclosed please find three (3) copies of relief request D-3 and F-1 which are to be included as part of the previously transmitted CPSES Preservice Inspection Plan. Copies of these relief request 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,

*J. S. Marshall*  
J. S. Marshall

BSD:tls  
Enclosure

c - Robert Taylor  
Tom Taylor

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PDR ADOCK 05000445  
Q PDR

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*S. Burwell*

RELIEF REQUEST D-3

Component: Integral Attachments

Code Class: 3

Examination Requirements: Table IWD-2500-1

Items D1.20 thru D1.60 . . . . . VT-3 Visual

Items D2.20 thru D2.60 . . . . . VT-3 Visual

Items D3.20 thru D3.60 . . . . . VT-3 Visual

Basis for Relief:

Various pre-startup tests and inspections performed on integral attachments to a great extent duplicate the visual inspection requirement of the preservice inspection.

Alternative Examination:

Documentation provided for Manufacturers' inspection, Quality Assurance installation verification, preoperational test inspections and system functionability verification will be used in lieu of the IWD VT-3 visual inspection requirements.

## RELIEF REQUEST F-1

Component: Component Supports

Code Class: 1, 2 and 3

Examination Requirements: IWF-2200 and Table IWF-2500-2

IWF-2200 Preservice Examination

- a) All examinations listed in Table IWF-2500-2 shall be performed completely, once, as a preservice examination.
- b) All examinations shall be performed following the initiation of hot functional tests.

Basis for Relief:

Installation verification inspections to a great extent duplicate the inspection requirements of IWF. Performance of inspection after initiation of hot functional testing requires the removal and re-installation of large amounts of insulation which causes significant cost and schedule impacts.

Alternative Examination:

Documentation provided for Quality Assurance installation verification, preoperational test inspections and system functionality verification will be used in lieu of IWF component support inspections.