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TEXAS UTILITIES GENERATING COMPANY
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June 7, 1985

JOHN W. BECK
VICE PRESIDENT

Director of Nuclear Reactor Regulation
Attention: Mr. Vince S. Noonan, Director
Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

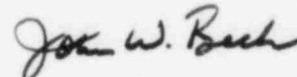
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
CONTAINMENT PROTECTIVE COATINGS

Dear Mr. Noonan:

As a result of the NRC evaluation of the safety significance of containment coatings as described in Supplement 9 of the Comanche Peak Safety Evaluation Report, TUGCO will institute a coatings application program consistent with that evaluation in CPSES Unit 2 containment. This program will commence on June 10, 1985 with a one week transition period and will be fully implemented by June 17, 1985. The elements of the program are described in Attachment A.

Further information will be supplied by August 1 on a proposed program to demonstrate the ability of containment coatings to maintain their integrity throughout the life of the plant without separating from the surfaces to which they have been applied. In addition, further information will be supplied to document the status of existing coatings as required by SSER 9, Appendix M, Section 4.

Sincerely,



John W. Beck

JSM/grr
Attachment

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ATTACHMENT A

NON-SAFETY RELATED CONTAINMENT COATINGS PROGRAM

I. PURPOSE

The purpose in developing the non-safety related coatings program is to achieve the following:

- a) Quality coatings and workmanship.
- b) Coating systems that will provide long term service with minimal maintenance during outages.
- c) Cost effectiveness in both application and verification of in-process coatings work.
- d) A means to systematically complete the work.
- e) Track and maintain current status on in-process operations.

II. SCOPE

The scope will include verification and documentation of surface preparation, control of ambient conditions, storage and use of proper materials, mixing and application of the coating systems.

III. BASIS FOR DEVELOPING THE PROGRAM

The development of the non-safety related coatings program is based on several considerations. The first is to obtain coating systems for both steel and concrete surfaces that will perform under the environmental conditions of the plant. These conditions are considered moderate to severe by both nuclear and non-nuclear standards. Other considerations are based on input included in Safety Evaluation Report NUREG-0797 Supplement 9.

In order to successfully achieve both corrosion resistant coating systems and coatings that perform satisfactorily when subjected to mild and harsh environments, a quality coatings program is essential.

IV. CRITERIA

To achieve the required results of the non-safety related coatings program the following program elements will be initiated:

- a) Use coating materials which meet the design basis accident conditions. Continue to use currently specified materials with the same dry film thickness tolerances.
- b) Comply with the technical requirements of the current paint application specification 2323-AS-31. This is considered good coating practice. However, inspection and documentation by the Site Quality Control Department will no longer be utilized.
- c) Quality verification of coating work and the generation of documentation will be under the responsibility of the Unit #2 Coating Engineering Manager and the Field Engineering Group under his supervision.

- d) Traceability of coating quality verification documentation will be to a simplified version of the current Q program.

Based on the above, technical documents relating to containment painting have been revised as follows:

1. Specification 2323-AS-31 - References to Quality Assurance Documentation have been deleted.
2. Site Construction Procedures - These procedures were revised to delete reference to quality assurance requirements. Inspection verification will be performed by Field Engineers. Basic technical requirements will remain intact to comply with specification AS-31 and coatings manufacturer's recommendation.
3. Site Coating Inspection Procedures - These procedures were revised to remove the responsibility of coating quality verification from the Q.C. department and place it under the Field Engineers.

Engineering verifications will be made and documented for the steps of the coating work:

- a) Adequacy of facilities and equipment for storage, surface preparation, mixing, application and curing.
- b) On-site receipt of coating materials.
- c) Substrates before and after surface preparation.
- d) Mixing and preparation of coating materials for application.
- e) Application of each coat while wet and film characteristics after drying and curing.
- f) Control of ambient conditions and surface temperatures during all phases of the coating work.

Several other related procedures were either revised or eliminated.

It should be emphasized at this point that the above steps are technically required in non-nuclear facilities where moderate to severe environmental conditions exist.

4. Coatings Exempt Log - Although all coatings are now considered exempt, the NRC requires that we maintain the Coatings Exempt Log (CEL) separately to identify all items which did not meet the requirements in effect at the time the coating work was performed.

This log will be used in planning future inspection coatings if necessary, to be consistent with the guidelines required in Appendix L of NUREG-0797, Supplement No. 9.

V. TRACEABILITY OF RECORDS AND DOCUMENTATION

An effective Protective Coatings Paper Flow Group will continue to maintain traceability of coatings. The traveler system has been

modified to conform to the non-safety related program. This documentation program is an integral part of the controls and tracking program necessary to manage the coatings effort.

VI. COMPUTER TRACKING PROGRAM (Protective Coatings Master Report)

A computer program has been designed to supplement the protective coatings activities by providing the record for assigning Activity Report Numbers, weekly statusing of work and traceability of reports by number, component, package and room number, along with additional data to provide a source of production trending.

VII. ORGANIZATION

The major organization change will occur in the area of inspection activities. Qualified Q.C. Inspectors will be known as Quality Verification Engineers and will be assigned to the Coatings Engineering Group. They will be responsible to the Coatings Engineering Manager with direct supervision by the Field Coatings Engineer.

Training, instructions and technical guidance will be provided by the Field Coatings Engineer and/or the Coatings Engineering Manager.

VIII. SUMMARY

1. The non-safety related coatings program was developed to achieve quality coatings and quality workmanship to assure long term service with minimal maintenance.
2. We will maintain the same standards for materials and workmanship.
3. Quality verification of coating work and the generation of documentation will be under the direction of the Coating Engineering Manager. The Quality Verification Engineers will be directly supervised by the Field Engineer.
4. All applicable specifications and procedures were revised to accommodate the non-safety related coatings program.
5. A simplified traveler system has been developed to conform to the program to assure traceability of all coatings work.
6. A computer program will be used to provide statusing of work, traceability of reports and a source for production trending.
7. The Coatings Exempt Log will continue to be maintained.