

TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER - DALLAS, TEXAS 75201

Log # TXX-3416
File # 904

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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
NRC QUESTION ON FUEL CYCLE

Dear Mr. Burwell:

Please find attached our response to your informal question
on future fuel cycles.

If you have any questions, please call.

Sincerely,

H. C. Schmidt
H. C. Schmidt

HCS:AND:kp

Attachment

c - Messrs. J. T. Merritt
J. C. Kuykendall
A. T. Parker
R. L. Janne
W. J. Nixon

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PDR ADOCK 05000445
A PDR

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ATTACHMENT TO TXX-3416

Question Standard format and content of Safety Analysis Reports, Regulatory Guide 1.70, states that in Chapter 4 of the SAR "...the applicant should provide an evaluation and supporting information to establish the capability of the reactor to perform its safety functions throughout its design lifetime under all normal operation modes..."

Are the analyses presented in Section 4.4 representative of the initial core only or have future cycles been analyzed? Provide a discussion of how power distributions for future cycles are considered in the FSAR analyses. Is there any assurance that the Comanche Peak Units can operate at the licensed power level without excessive DNB trips throughout future cycles? Will revisions to the design methodology be required in order to maintain sufficient thermal margin?

Response The goal of the reload safety evaluation is to confirm the validity of the existing safety analysis. The existing safety analysis is defined as the reference safety analysis and is intended to be valid for all plant cycles. Thus safety analysis input parameter values are selected to bound the values expected in all subsequent cycles. This bounding analysis concept is the key to the Westinghouse reload safety analysis methodology. When all reload safety related parameters for a given accident are bounded, the reference safety analysis is valid. On the other hand, if a reload parameter is not bounded, further evaluation would be necessary. The purpose of this further evaluation would be to confirm that the margin of safety defined in the basis for any technical specification is not reduced. This reload safety evaluation methodology is applied whenever the input parameter values for a reference safety analysis are available. In summary, the reload safety evaluation methodology consists of:

1. A systematic evaluation to determine whether the reload parameters are bounded by the values used in the reference safety analysis.
2. A determination of the effects on the reference safety analysis when a reload parameter is not bounded to ensure that specified design bases are met.

When the above process identifies either a potential unreviewed safety question or the need for a change in the plant Technical Specifications, the licensee will make the appropriate notification to the NRC.