

TEXAS UTILITIES GENERATING COMPANY

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Log # TXX-3456
File # 10010

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EXECUTIVE VICE PRESIDENT
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January 6, 1982

Dr. Harold R. Denton
Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
ECCS ANALYSIS FOR LARGE BREAK LOCA
ASSUMING NO SINGLE FAILURE

Dear Dr. Denton:

This letter is to provide you with a summary of an error that has been discovered in the ECCS analysis for Comanche Peak Steam Electric Station (CPSES) and how this error impacts CPSES. The error involved is that the single failure of the emergency safeguard equipment assumed in the large break ECCS analysis does not represent the most limiting assumption possible. In fact, it is more conservative to assume no failure in the emergency safeguards equipment.

For CPSES, there is a one degree F penalty associated with the assumption of no single failure. The CPSES FSAR analysis results indicate a 189°F margin to the 10CFR50.46 ECCS acceptance criteria. In addition, there is an expected reduction in calculated peak cladding temperature of 88°F anticipated with the use of the newly approved 1981 version of the Westinghouse ECCS Evaluation Model. Thus, the net margin to 2200°F for CPSES is substantial.

Westinghouse has previously met with the U. S. Nuclear Regulatory Commission to review this subject on a generic basis. As a result of that meeting, it was agreed that no reanalyses are required and that each affected utility should submit to the NRC a summary of this issue and its impact on their plant. This letter satisfies that agreement.

Respectfully submitted,

R. J. Gary
R. J. Gary

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