



Portland General Electric Company

James E. Cross Vice President, Nuclear

December 31, 1991
Trojan Nuclear Plant
Docket 50-344
License NPF-1

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington DC 20555

Dear Sir:

Pipe Whip Restraint Design Verification Program
and Request for Approval of Leak-Before-Break Analysis
of Reactor Coolant System Auxiliary Piping

By a letter dated January 20, 1989, "Design Verification Programs", Portland General Electric Company (PGE) reported the results of three comprehensive programs that were undertaken in response to design concerns identified at Trojan during the 1987 Refueling Outage. One of these programs was the Pipe Whip Restraint Design Verification Program. In regard to that program, the letter noted an outstanding item which was the completion of a leak-before-break (LBB) analysis to show that modifications are not required for certain pipe whip restraints on auxiliary lines. PGE committed to submit the analysis for your approval in 1990. In letters dated December 28, 1990 and June 28, 1991, "Pipe Whip Restraint Design Verification Program", PGE changed the submittal date for the 4-in. lines to December 31, 1991.

Title 10 to the Code of Federal Regulations, Part 50 (10 CFR 50), Appendix A, General Design Criteria 4, states that, "However, dynamic effects associated with postulated pipe ruptures in nuclear power units may be excluded from the design basis when analyses reviewed and approved by the Commission demonstrate the probability of fluid system piping rupture is extremely low under conditions consistent with the design basis for the piping". Attachments 1 and 2 to this letter contain a Westinghouse report (with proprietary, WCAP 13076, and nonproprietary, WCAP 13077, versions) documenting the required analyses. These reports use the recommendations and criteria proposed in NUREG 1061, Volume 3 and the methodology described in the draft revision of Standard Review Plan 3.6.3, published August 28, 1987.

Also attached is Westinghouse Authorization Letter CAW-91-237, accompanying affidavit, Proprietary Information Notice, and Copyright Notice. Because WCAP-13076 contains information proprietary to Westinghouse Electric Corporation, the report is supported by an affidavit signed by Westinghouse, the owner of the information, providing the basis on which the information should be withheld from public disclosure by the Commission. The affidavit addresses the specific considerations listed in

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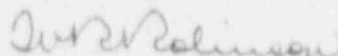
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Paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790. Correspondence with respect to the copyright or proprietary aspects of the Westinghouse report or the supporting Westinghouse affidavit should reference CAW-91-237 and should be addressed to R. F. Williams, Manager of Nuclear Safety Licensing, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh PA 15230-0355.

The attached report covers portions of the Reactor Coolant System pressurizer spray lines with installed pipe whip restraints. Upon approval of the attached report by the Nuclear Regulatory Commission, these piping lines will no longer need to be designed for dynamic effects due to postulated pipe ruptures, and therefore, no modifications to their pipe whip restraints will be required. This concludes the commitment made in the PGE letter of January 20, 1989 discussed above.

Sincerely,



W. R. Robinson
for J. E. Cross

Attachments

- (1) WCAP-13076
- (2) WCAP-13077
- (3) Westinghouse to NRC, December 9, 1991, CAW-91-237

cc: Mr. John H. Martin
Regional Administrator, Region V
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith, with nonproprietary attachment
State of Oregon
Department of Energy

Mr. R. C. Barr, without attachments
NRC Resident Inspector
Trojan Nuclear Plant