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TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER * 400 NORTH OLIVE STREET, L.B. 81 * DALLAS, TEXAS 75201

June 7, 1984

Director, Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> ATTN: Mr. B. J. Youngblood Division of Licensing Licensing Branch No. 1

SUBJ: COMANCHE PEAK STEAM ELECTRIC STATION
UNITS 1 and 2: DOCKET NOS. 50-445 and 50-446
REQUEST FOR PARTIAL EXEMPTION

- REF: (a) Letter TXX-4118 from R.J. Gary (TU) to B.J. Youngblood (NRC) dated February 17, 1984
 - (b) Letter TXX-4159 from H.C. Schmidt (TU) to H.R. Denton NRC, dated April 23, 1984

Gentlemen:

This is to clarify the scope of Texas Utilities' present request for a partial exemption from GDC4 regarding consideration of certain fluid discharge (jet impingement) loads, set forth in our February 17, 1934, letter to you (Ref. (a)) and supplemented by the value-impact analysis transmitted by letter of April 23, 1984 (Ref. (b)). As noted in our February 17 letter, Texas Utilities presently seeks exemption from the need to consider certain jet impingement loads in the design of Unit 1 structures. Specifically, the requested exemption would obviate the need to install those jet shields associated with postulated primary loop pipe breaks in eight (8) locations per loop in Unit 1. This request does not encompass other shields or restraints already installed in Comanche Peak Units 1 or 2 or yet to be installed in Unit 2. We recognize that the supporting analyses for our request encompasses other structures in Units 1 and 2. However, this request is limited to the above described scope.

Sincerely,

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H.C. Schmidt Manager, Nuclear Services

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