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 Ref. # 10CIR2.790

TU ELECTRIC

February 14, 1992

William J. Cahill, Jr.
 Group Vice President

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
 DOCKET NO. 50-472
 PRESSURIZER SURGE LINE - LEAK-BEFORE-BREAK
 QUALIFICATION PLAN COMANCHE (CP)

Gentlemen:

TU Electric has completed a plant-specific analysis on the Comanche Peak Unit 2 Pressurizer Surge Line (Surge Line) with respect to leak-before-break qualification. The analysis shows that the Surge Line satisfies leak-before-break criteria. The analysis concludes that the design life (forty years) and ASME III Code compliance are not affected. This letter provides the plant specific analysis in a total of one attachment and three enclosures.

The attachment provides the required affidavit in accordance with the reporting requirements of NRC Bulletin 88-11 that responses be submitted under oath or affirmation under the provisions of section 192a, Atomic Energy Act of 1954, as amended.

TU Electric Company is transmitting the following reports for NRC review and approval.

1. 4 copies of WCAP-13100, "Technical Justification for Eliminating Pressurizer Surge Line Rupture from the Structural Design Basis for Comanche Peak Unit 2" (Proprietary). (Enclosure 1)
2. 4 copies of WCAP-13101, "Technical Justification for Eliminating Pressurizer Surge Line Rupture from the Structural Design Basis for Comanche Peak Unit 2" (Non-Proprietary). (Enclosure 2)

Also enclosed are a Westinghouse authorization letter, CAW-91-247, accompanying affidavit, Proprietary Information Notice, and Copyright Notice. (Enclosure 3)

As Enclosure 1 contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b) (4) of Section 2.790 of the Commission's regulations.

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400 N. Olive Street L.B. 81 Dallas, Texas 75201

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TXX-92076
Page 2 of 2

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 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-91-247 and should be addressed to R. P. DiPiazza, Manager of Nuclear Safety Licensing, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355

Sincerely,



William J. Cahill, Jr.

CEJ/gj
Attachment
Enclosure (3)

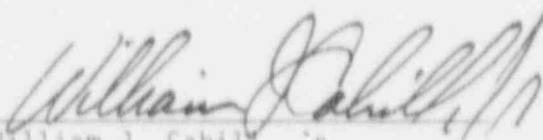
c - Mr. R. D. Martin, Region IV w/o enclosure
Resident Inspectors, CPSES (2) w/o enclosure

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Texas Utilities Electric Company) Docket No. 50-446
)
(Comanche Peak Steam Electric)
Station, Unit 2))

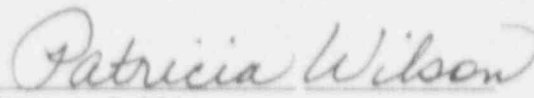
AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this transmittal of Westinghouse WCAPs on pressurizer surge line leak before leak qualification; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.


William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF SOMERVELL

Subscribed and sworn to before me, on this 14th day of February, 1992.


Notary Public

