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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 (CPSSES) - UNIT 2
 DOCKET NO. 50-446
 LEAK-BEFORE-BREAK QUALIFICATION FOR THE RESIDUAL HEAT
 REMOVAL (RHR) LINES

Gentlemen:

TU Electric has completed analyses of the Comanche Peak Unit 2 RHR suction lines with respect to leak-before-break issues. The analyses show that the RHR suction lines satisfy leak-before-break criteria.

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

1. 4 copies of WCAP-13165, "Technical Justification for Eliminating Residual Heat Removal Lines Rupture as the Structural Design Basis for Comanche Peak Nuclear Plant - Unit 2" (Enclosure 1)
2. 4 copies of WCAP-13166, "Technical Justification for Eliminating Residual heat Removal Line Rupture as the Structural Design Basis for Comanche Peak Unit 2" (Non-Proprietary). (Enclosure 2)

Also enclosed are a Westinghouse authorization letter, CAW-91-248, accompanying affidavit, Proprietary Information Notice, and Copyright Notice. (Enclosure 3)

As Item 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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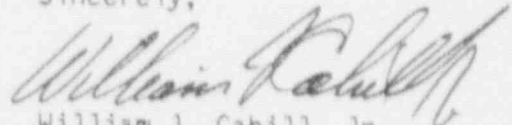
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Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-91-248 and should be addressed to R. P. DiPiazza, Manager of Nuclear Safety Licensing, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355

Please note that there are several typographical errors in WCAP-13165 and WCAP-13166. On page 4-2, equation 4-3 and page 4-3, equation 4-9 in both WCAPs, change "F_p" to "F_p". At the top of page 5-5 in WCAP-13165 and at the bottom of page 5-4 in WCAP-13166, change "...O.D.=14.00 inches..." to "...O.D.=12.75 inches...". This change in O.D. results in a change to "Z" in the same location on the page for SMAW Z = 1.28 (not 1.30) and for SAW, Z=1.41 (not 1.43).

Sincerely,



William J. Cahill, Jr.

CEJ/gj
Enclosure (3)

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