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Ref. # NRCB 88-11

February 24, 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
NRC BULLETIN 88-11: PRESSURIZER SURGE LINE
THERMAL STRATIFICATION FOR COMANCHE PEAK UNIT 2

Gentlemen:

TU Electric has completed a plant-specific analysis of the effects of thermal stratification on the Comanche Peak Unit 2 Pressurizer Surge Line (Surge Line) in accordance with the requirements of Action 2a of NRC Bulletin 88-11. The analysis shows that there is no effect on the Surge Line integrity and that NRC Bulletin 88-11 requirements are satisfied. The analysis concludes that the design life (forty years) and ASME Boiler and Pressure Vessel Code Section III compliance are not affected.

The attachment to this letter 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 182a, Atomic Energy Act of 1954, as amended. The analysis consists of enclosures to this letter as identified below:

The first enclosure consists of five (5) copies of WCAP-13210, titled "Evaluation of Thermal Stratification For The Comanche Peak Unit 2 Pressurizer Surge Line" (Proprietary).

The second enclosure consists of five (5) copies of WCAP-13217, titled "Evaluation of Thermal Stratification For The Comanche Peak Unit 2 Pressurizer Surge Line" (Non-Proprietary).

The third enclosure consists of a Westinghouse Application for Withholding Proprietary Information with Accompanying Affidavit CAW-92-271, Proprietary Information Notice and Copyright Notice.

As this submittal 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 10CFR2.790.

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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 10CFR2.790. Correspondence with respect to the proprietary aspects of the Application for Withholding should reference CAW-92-271 or the supporting Westinghouse affidavit should reference CAW-92-271 and be addressed to R. P. DiPiazza, Manager of Nuclear Safety Licensing, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

The remaining action required by Bulletin 88-11 Action 2a is to assess Hot Functional Test data to confirm the conclusions of the Surge Line analysis for Unit 2. This action will be completed subsequent to Hot Functional Testing for Unit 2.

Sincerely,



William J. Cahill, Jr.

CEJ/gj
Attachment
Enclosures

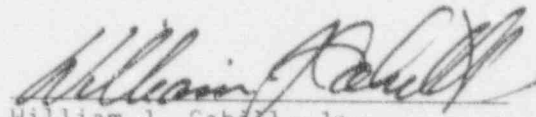
c - Mr. M. B. Fields, NRR, w/encl
Mr. R. D. Martin, Region IV w/o encl
Resident Inspectors, (CPSES) (3) w/o encl

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

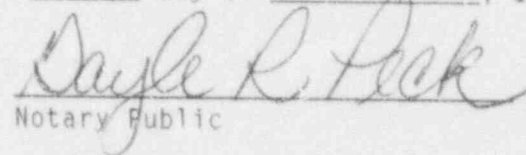
William J. Cahill, Jr. being duly sworn hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to NRC Bulletin 88-11 on thermal stratification of the Unit 2 pressurizer surge line for the captioned facility; 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 DALLAS)

Subscribed and sworn to before me, on this 24th day of February, 1992.



Notary Public