



March 26, 1992
LD-92-042

Docket No. 52-002

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

Subject: Applicability of Leak Before Break Methodology

Reference: C-E Letter LD-92-007, dated January 24, 1992

Dear Sirs:

The reference letter included several responses on the application of Leak Before Break methodology in the System 80+™ design process. In a meeting with NRC staff on February 26, 1992, the applicability of Leak Before Break methods to the analysis of subcompartments was discussed. To document that discussion, the following statement is provided to supplement the response to RAI 210.13.

"Where Leak Before Break is used to eliminate postulated breaks in a piping system, walls of the subcompartment containing that piping system are neither thinned in anticipation of elimination of pressure effects from those breaks nor designed for pressure effects from those breaks. The walls of every System 80+ subcompartment, however, are sufficiently thick that they could be designed for the pressure effects from a postulated double-ended guillotine rupture in the largest high energy line in that subcompartment without increasing the wall thickness."

The above statement is also appropriate to the responses to RAIs 210.27, 210.49, 210.54, 210.56, 210.75, 210.90, and 210.91 which all reference response 210.13. If there are any questions on the above, please contact Mr. Stan Ritterbusch at (203) 285-5206.

Very truly yours,

COMBUSTION ENGINEERING, INC.

C. B. Brinkman
Acting Director
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ser/lw

cc: J. Trotter (EPRI)
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