

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

Log # TXX-4275
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August 22, 1984

Mr. B. J. Youngblood, Chief
Division of Licensing
Licensing Branch No. 1
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO STEAM GENERATOR TUBE RUPTURE CONCERN

Dear Mr. Youngblood:

Texas Utilities Generating Company (TUGCO) has been working with the NRC and Westinghouse through the Westinghouse Owners Group (WOG) on the reevaluation of the accident scenario for Steam Generator Tube Rupture (SGTR). As part of the WOG we have participated in the meetings and discussions on SGTR referred to in your letter dated August 9, 1984.

TUGCO, Westinghouse and the WOG as part of the scope of the ongoing SGTR study (reviewed and commented on the NRC) are working on the questions sent to us by your letter of April 9, 1984. It is now planned that the SGTR reevaluation will include (but will not necessarily be limited to) the following:

- 1) Calculations to determine the margin to overfill and the equilibrium breakflow showing the time to overfill is greater than the time to equalization.
- 2) Operator action times used in the analysis will be verified.
- 3) Plant specific justification for use of certain non-safety grade equipment in recovery from a SGTR event.
- 4) Rational and justification that the analysis is conservative from the standpoint of radiological releases.
- 5) An analysis of the effects of steam line overfill on the integrity of steam line piping and supports.

From the information developed to date and the favorable response received from the NRC on the WOG-SGTR program, we believe that this issue will be resolved with minimal impact on Comanche Peak and that

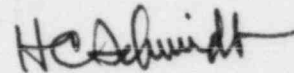
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operation in the interim is justified. This interim operation is enhanced by the fact that Comanche Peak is a new plant and TUGCO is an active participant in the WOG-SGTR Subgroup.

We believe that the above information is responsive to your request for additional information. If you have any additional questions, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "H. C. Schmidt". The signature is written in a cursive style with a horizontal line extending to the right.

H. C. Schmidt

RAW:tls

c - J. J. Stefano