December 15, 1995

Mr. C. Lance Terry Group Vice President, Nuclear TU Electric Energy Plaza 1601 Bryan Street, 12th Floor Dallas, TX 75201-3411

Dear Mr. Terry:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON COMANCHE PEAK STEAM ELECTRIC STATION RESPONSE TO GENERIC LETTER 95-03 CIRCUMFERENTIAL CRACKING OF STEAM GENERATOR TUBES (TAC NOS. M92233 AND M92234)

Based on our review of the Texas Utilities Electric responses to Generic Letter 95-03 "Circumferential Cracking of Steam Generator Tubes," submitted by letter dated June 27, 1995, (TXX-95169) the NRC staff has identified additional information needed to continue its review. The detailed request for additional information (RAI) is discussed in the enclosure.

We request your response to our RAI within 30 days of receipt of this letter. This request is within the original reporting burden for information collection of 350 hours covered by the Office of Management and Budget clearance number 3150-0011, which expires July 31, 1997. If you have any questions, please call me at (301) 415-1038.

Sincerely,

ORIGINAL SIGNED BY:

Timothy J. Polich, Project Manager Project Directorate IV-1 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

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Docket Nos. 50-445 and 50-446

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 15, 1995

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We request your response to our RAI within 30 days of receipt of this letter. This request is within the original reporting burden for information collection of 350 hours covered by the Office of Management and Budget clearance number 3150-7011, which expires July 31, 1997. If you have any questions, please call me at (301) 415-1038.

Sincerely,

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Timothy J. Polich, Project Manager Project Directorate IV-1 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

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Mr. C. Lance Terry TU Electric Company

cc: Senior Resident Inspector U.S. Nuclear Regulatory Commission P. O. Box 1029 Granbury, TX 76048

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011

Mrs. Juanita Ellis, President Citizens Association for Sound Energy 1426 South Polk Dallas, TX 75224

Mr. Roger D. Walker, Manager Regulatory Affairs for Nuclear Engineering Organization Texas Utilities Electric Company 1601 Bryan Street, 12th Floor Dallas, TX 75201-3411

Texas Utilities Electric Company c/o Bethesda Licensing 3 Metro Center, Suite 610 Bothesda, MD 20814

George L. Edgar, Esq. Morgan, Lewis & Bockius 1800 M Street, N.W. Washington, DC 20036-5869 Comanche Peak, Units 1 and 2

Honorable Dale McPherson County Judge P. O. Box 851 Glen Rose, TX 76043

Office of the Governor ATTN: Susan Rieff, Director Environmental Policy P. O. Box 12428 Austin, TX 78711

Arthur C. Tate, Director Division of Compliance & Inspection Bureau of Radiation Control Texas Department of Health 1100 West 49th Street Austin, TX 78756-3189

COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

REQUEST FOR ADDITIONAL INFORMATION REGARDING

GENERIC LETTER 95-03

CIRCUMFERENTIAL CRACKING OF STEAM GENERATOR TUBES

- For the examinations to be performed during your next inspection at Units 1 and 2, you indicated that supplemental techniques will be used for these inspections. Please clarify what techniques will be used (e.g., a probe qualified per industry guidelines for circumferential crack detection, etc.).
- Clarify the inspections performed in the U-bend region of Row 1 and 2 tubes during your prior inspections at Units 1 (i.e., March 1995) and 2 (October 1994).
- 3. In your response, you indicated that dents exceeding 5.0 volts at the lowest hot leg support plate will be examined. Provide the procedure used for sizing the dents (i.e., 2.75 volts peak-to-peak on 4-20% through-wall ASME holes at 550/130 mix). If the procedure is identical to the procedure for the voltage-based repair criteria, a detailed description is not necessary.

It was indicated that the sample plan for dents may be limited to the lowest tube support plate. A large dent at an upper tube support plate may be more significant in terms of corrosion susceptibility as a result of higher stresses than a small dent at a lower tube support plate even though the temperature is lower at the upper tube support plate. Given this, discuss the basis for the proposed sample strategy given that cracking depends on many factors including temperature and stress levels.

Clarify the inspections performed at dented locations in Unit 1 during your prior inspection (i.e., March 1995). For example, did the 6% of the first hot-leg tube support plate intersections include dented intersections or was the sample randomly chosen?

Clarify the inspections performed at dented locations in Unit 2 during your prior inspection (i.e., October 1994).

 Clarify whether the expansion criteria in Unit 2 will include expanding the sample to all four steam generators.

ENCLOSURE

5. During the Maine Yankee outage in July/August 1994, several weaknesses were identified in their eddy current program as detailed in NRC Information Notice 94-88, "Inservice Inspection Deficiencies Result in Severely Degraded Steam Generator Tubes". In Information Notice 94-88, the staff observed that several circumferential indications could be traced back to earlier inspections when the data was reanalyzed using terrain plots. These terrain plots had not been generated as part of the original field analysis for these tubes. For the rotating pancake coil (RPC) examinations performed at your plant at locations susceptible to circumferential cracking during the previous inspection (i.e., previous inspection per your Generic Letter 95-03 response), discuss the extent to which terrain plots were used to analyze the eddy current data. If terrain plots were not routinely used at locations susceptible to circumferential cracking, discuss whether or not the RPC eddy current data has been reanalyzed using terrain mapping of the data. If terrain plots were not routinely used during the outage and your data has not been reanalyzed with terrain mapping of the data, discuss your basis for not reanalyzing your previous RPC data in light of the findings at Maine Yankee.

Discuss whether terrain plots will be used to analyze the RPC eddy current data at locations susceptible to circumferential cracking during your next steam generator tube inspection (i.e., the next inspection per your Generic Letter 95-03 response).