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**TU ELECTRIC** June 10, 1992

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 Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
 DOCKET NO. 50-446  
 RHR HEAT EXCHANGER SUPPORT DESIGN  
 SDAR: CP-88-24 (FINAL REPORT - UNIT 2)

Gentlemen:

On October 6, 1988, TU Electric's report logged TXX-88724 notified the NRC of a reportable deficiency in the support configuration of the residual heat removal (RHR) heat exchangers. The last correspondence on this issue was TXX-89259 dated May 17, 1989, which provided a supplemental report for Unit 1 and an interim report for Unit 2. TXX-89259 indicated that a final report for Unit 2 would be submitted prior to Unit 2 fuel load. This information is provided below.

DESCRIPTION

The purchase specification supplied to the Nuclear Steam Supply System (NSSS) vendor indicated that the RHR heat exchangers would be mounted on rigid supports. However, design validation of the RHR heat exchanger supports indicated that the final design and as-built construction of the supports were not rigid. An analysis was performed to determine if the RHR heat exchangers could still be qualified when considering the stiffness of the as-built support arrangement. This analysis showed that the heat exchanger support arrangement resulted in an overstressed condition in the heat exchanger shells.

This deficiency was caused by failure of the original design organization to design rigid supports for the RHR heat exchangers.

SAFETY IMPLICATION

The RHR heat exchangers are utilized to establish and maintain cold shutdown conditions following postulated events. A failure in the shells of both RHR heat exchangers following a seismic event may have resulted in the inability to achieve and maintain a cold shutdown condition.

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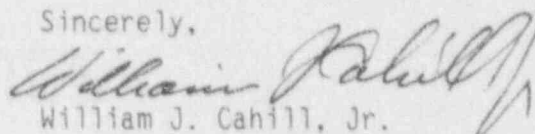
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CORRECTIVE ACTION

As previously discussed in correspondence for Unit 1, correction of this deficiency required the identification of modifications to restore the necessary degree of rigidity to the heat exchanger support structure. These modifications required analysis by the heat exchanger vendor to ensure elimination of the overstress condition in the heat exchanger shell followed by a final reconciliation of support loads at several levels in the heat exchanger support structure.

The same modifications required for resolution of this deficiency in Unit 1 have been implemented for Unit 2, and final reconciliation of the support loads is in progress. Although not expected by Engineering, if the need for any additional modifications is identified during final reconciliation, you will be notified of these modifications and the modifications will be implemented prior to Unit 2 fuel load.

Sincerely,



William J. Cahill, Jr.

CBC/JAA/tg

c - Mr. R. D. Martin, Region IV  
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