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**C A S E**

(CITIZENS ASSN. FOR SOUND ENERGY)

September 26, 1984

1426 S. Polk  
Dallas, Texas 75224

214/946-9446

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Administrative Judge Peter B. Bloch  
U. S. Nuclear Regulatory Commission  
4350 East/West Highway, 4th Floor  
Bethesda, Maryland 20014

Dr. Walter H. Jordan  
881 W. Outer Drive  
Oak Ridge, Tennessee 37830

Dr. Kenneth A. McCollom, Dean  
Division of Engineering, Architecture  
and Technology  
Oklahoma State University  
Stillwater, Oklahoma 74074

Gentlemen:

SUBJECT: In the Matter of  
Application of Texas Utilities  
Generating Company, et al. for  
An Operating License for  
Comanche Peak Steam Electric Station  
Units #1 and #2 (CPSES)  
Docket Nos. 50-445 and 50-446 *OL*

Board's 9/17/84 Memorandum and Order  
(Directing Release of OI Reports)

CASE is in complete agreement with the Board's subject Order, with one minor exception. The Board has stated (page 5):

"The Board is willing to limit those included in the protective order to two legal representatives for each party . . ."

If the Board does indeed make such limitation, CASE must designate myself and Mr. Roisman as those two representatives. However, we believe because of the unusual circumstances wherein we are separated not only by distance but by the press of working on different things at different times, it would be far preferable and would in no way increase the number of individuals so designated to the point of jeopardizing the level of confidentiality for Ms. Garde to also be included, and we request that the Board allow CASE three representatives in this unusual instance. Otherwise, as stated in the preceding, CASE designates myself and Mr. Roisman as the two representatives.

Respectfully submitted,

CASE (Citizens Association for Sound Energy)

8410020356 840926  
PDR ADOCK 05000445  
G PDR

*Juanita Ellis*  
(Mrs.) Juanita Ellis  
President

cc: Service List

D503

# Babcock & Wilcox

a McDermott company

Utility Power Generation Division

3315 Old Forest Road  
P.O. Box 1260  
Lynchburg, VA 24505-1260  
(804) 385-2000

September 26, 1984

Mr. Cecil O. Thomas, Chief  
Standardization and Special Projects Branch  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Thomas:

We have recently received your letters concerning acceptance for referencing of the topical reports BAW-10129<sup>(1)</sup> and BAW-10130<sup>(2)</sup> (LYNX1 and LYNX2 Codes). Both letters state that,

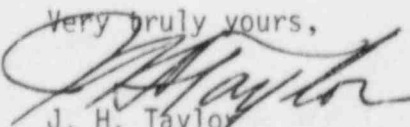
"We have concluded that the combination LYNX-1 providing bundle boundary conditions for the LYNX-2 subchannel code (two-pass analysis) is an acceptable method for evaluating DNBR margins when used in licensing calculations with NRC approved CHF correlations. The BWC correlation currently used by B&W is acceptable for the purpose."

The purpose of this letter is to note that B&W-2<sup>(3)</sup> is also an NRC approved CHF correlation and that B&W-2 is currently used by B&W for evaluating DNBR margins in reactor cores which utilize our 15x15 Mark-B fuel assembly design. The use of B&W-2, in the two-pass LYNX1/LYNX2 analysis, is an appropriate method of evaluating DNBR margins as demonstrated by the following:

- a) Reference 4 provides a comparative analysis which demonstrates that the use of B&W-2 is appropriate for DNBR evaluations using the LYNXT<sup>(3)</sup> code.
- b) References 5 and 6 provide comparative analyses which demonstrate that LYNX2 and LYNXT are equivalent when used for DNBR calculations.

Since B&W-2 is an NRC-approved CHF correlation and has been shown to be appropriate for use in crossflow analyses, we consider the acceptance of LYNX1/LYNX2 for DNBR margin evaluations to encompass the use of B&W-2 as well as BWC. As a matter of clarification we plan to include this letter in the accepted versions of the LYNX1 and LYNX2 topical reports. Should you need any further information concerning this subject, please contact Mr. C. F. McPhatter at (804) 385-2401.

Very truly yours,



J. H. Taylor  
Manager, Licensing

8410020369 840926  
PDR TOPRP EMVBW  
C PDR

JHT/lec

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## References

1. Letter, Cecil O. Thomas to J. H. Taylor, Acceptance for Referencing of Licensing Topical Report BAW-10129, "LYNX1 - Reactor Fuel Assembly Thermal Hydraulic Analysis Code," August 23, 1984.
2. Letter, Cecil O. Thomas to J. H. Taylor, Acceptance for Referencing of Licensing Topical Report BAW-10130, "LYNX2 - Subchannel Thermal-Hydraulic Analysis Program," August 23, 1984.
3. "Correlation of Critical Heat Flux in a Bundle Cooled By Pressurized Water," BAW-10000A, Babcock & Wilcox, Lynchburg, VA, May 1976.
4. Letter, J. H. Taylor to Cecil O. Thomas, August 27, 1984.
5. R. L. Harne/J. H. Jones, "Thermal-Hydraulic Crossflow Applications," BAW-1829, Babcock & Wilcox, April 1984.
6. Letter, J. H. Taylor to Cecil O. Thomas, "Request Number One for Additional Information - BAW-10156, May 4, 1984," July 2, 1984.

cc: R. B. Borsum (B&W)  
G. Schwenk (NRC)