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TEXAS UTILITIES GENERATING COMPANY
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JOHN W. BECK
MANAGER-LICENSING

January 25, 1985

Mr. Harold R. Denton, Director
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
CODE CASE USAGE

Dear Mr. Denton:

In accordance with 10CFR50.55a(a)(3) NRC approval is requested for the usage of ASME Code Cases N-397 and N-411 for the analysis of ASME Class 1, 2 and 3 piping at CPSES Units 1 and 2.

Code Case N-397 contains an alternative method to spectral broadening which is a more reasonable and realistic approach to piping analysis.

Code Case N-411 contains alternative damping factors that can be used in lieu of values contained in Section III, Division I, Table N-1230-1 of the ASME Code. These damping values are more reasonable and realistic values to use in the seismic analysis of piping.

Applying these code cases to CPSES Units 1 and 2 piping analyses still provides sufficient levels of conservatism to assure functionality under the design conditions.

Should you have additional questions in this matter, please contact this office.

Respectfully,

John W. Beck
John W. Beck

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c - J. J. Stefano

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