

SNUPPS

Standardized Nuclear Unit  
Power Plant System

5 Choke Cherry Road  
Rockville, Maryland 20850  
(301) 869-8010

Nicholas A. Petrick  
Executive Director

October 26, 1984

SLNRC 84-125 FILE: 0279  
SUBJ: Request for Partial Exemption  
from Provisions of GDC-4

✓ Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docket Nos: 50-482 and STN 50-483

Ref: (a) SNUPPS Letter SLNRC 84-0088, 05/31/84: Request for  
Partial Exemption from Provisions of GDC-4

(b) NRC Letter to Texas Utilities Generating Co. (TUGCo),  
dated 3/2/84, Comanche Peak Steam Electric Station  
Units 1 and 2, Docket Nos. 50-445 and 50-446

Dear Mr. Denton:

The reference (a) letter informed the NRC that SNUPPS was requesting the elimination of postulated pipe breaks in the RCS primary loop from the structural design basis of the Callaway and Wolf Creek plants. As part of that letter, Westinghouse reports WCAP-10500 and WCAP-10501, "Technical Bases for Eliminating Large Primary Loop Pipe Rupture as Structural Design Basis for Callaway and Wolf Creek Plants" (both proprietary and non-proprietary versions) were enclosed. Those reports provided the type of information requested by the Staff for NRC review of the technical bases for elimination of RCS primary loop pipe breaks.

The reference (b) NRC letter indicated that the NRC Staff had reviewed (1) the leak-before-break analysis provided by TUGCo on their Comanche Peak docket, and (2) the generic Westinghouse report WCAP-10456 dealing with fracture toughness of piping materials under thermal aging conditions. As a result of that review, the Materials Engineering Branch (MEB) requested additional information to complete its evaluation on the subject matter for Comanche Peak as well as for other applicants requesting a similar GDC-4 exemption.

8410300317 841026  
PDR ADDCK 05000482  
A PDR

*Change:* LPOR 1 NP  
POR 1 NP  
NTIS 1 NP  
*1301*  
*1/3 Proof*  
*3 NonProof*

At a meeting held March 22, 1984, with representatives of the NRC Staff/Texas Utilities (representing the NTOL's)/Westinghouse to review the Staff questions, the Westinghouse approach to addressing the MEB requests was presented and favorably received by the NRC. On the basis of that meeting and subsequent communications with SNUPPS, Westinghouse has prepared responses to the referenced MEB request for additional information, specifically for the SNUPPS units as discussed below.

The purpose of this letter is to transmit 3 copies each of WCAP-10691 Westinghouse Proprietary, and WCAP-10690 (Non-Proprietary version of WCAP-10691), "Technical Bases for Eliminating Large Primary Loop Pipe Ruptures as the Structural Design Basis for Callaway and Wolf Creek Plants." WCAP-10691 is a new report (Proprietary and Non-Proprietary versions as appropriate) prepared specifically for the SNUPPS Units. This new report incorporates the previous material in Westinghouse report WCAP-10500 along with the additional information addressing MEB Items 121.16, 121.17, 121.18, and 121.19. For Item 121.20, an assessment of margins considering the loads, flaw size, and material toughness for the Callaway and Wolf Creek RCS piping material is also included. Results covering the elastic-plastic fracture mechanics analysis of the 4-inch thermally aged pipe in WCAP-10456 are essentially completed and have been handled on a generic basis between Westinghouse and the NRC.

Also enclosed is a Westinghouse authorization letter, CAW-84-93 and accompanying affidavit.

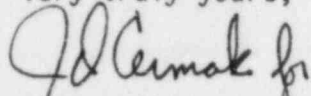
As WCAP-10691 contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR Section 2.790 of the Commission's regulations. Correspondence with respect to the proprietary aspects of the Application for Withholding or the supporting Westinghouse affidavit should reference CAW-84-93 and should be addressed to R. A. Wiesemann, Manager, Regulatory & Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230.

Your prompt review of the enclosed reports and action on our request for partial exemption from provisions of GDC-4 will be appreciated. The schedule of the Wolf Creek plant is such that the schedule for processing of our request is critical to the decision as to whether

improved reactor cavity shielding can be installed for startup testing and initial operations. With respect to Callaway, the existing water bags for cavity shielding have proved troublesome and replacement with improved shielding at an early date is desirable.

Very truly yours,



Nicholas A. Petrick

FS/bds/14a1  
Enclosures:

1. 3 copies of WCAP-10691, "Technical Bases for Eliminating Large Primary Loop Pipe Rupture as a Structural Design Basis for Callaway and Wolf Creek Plants," Westinghouse Proprietary Class 2, October 1984.
2. 3 copies of WCAP-10690, "Technical Bases for Eliminating Large Primary Loop Pipe Rupture as a Structural Design Basis for Callaway and Wolf Creek Plants," Westinghouse Non-Proprietary, October 1984.
3. 1 copy of Westinghouse authorization letter, CAW-84-93 and accompanying affidavit.

cc: D. F. Schnell	UE
G. L. Koester	KGE
J. M. Evans	KCPL
H. Bundy	USNRC/WC
J. Neisler/B. Little	USNRC/CAL
W. L. Forney	USNRC/RIII
D. R. Hunter	USNRC/RIV