



101 California Street, Suite 1000, San Francisco, CA 94111-5894

415/397-5600

October 22, 1984  
84056.035

Mr. S. Burwell  
Licensing Project Manager  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20084

Mr. J. B. George  
Project General Manager  
Texas Utilities Generating Company  
Highway FM 201  
Glen Rose, Texas 76043

Subject: Reactor Coolant Pump Thermal Barrier Rupture - Clarification  
Comanche Peak Steam Electric Station  
Independent Assessment Program  
Texas Utilities Generating Company  
Job No. 84056

Reference: N. H. Williams (Cygna) letter to S. Burwell (NRC) and J. B. George  
(TUGCO), 84056.032, "Reactor Coolant Thermal Barrier Rupture,"  
October 9, 1984

Gentlemen:

The referenced letter documented Cygna's concern in relation to a postulated rupture of the reactor coolant pump thermal barrier and its possible effect on the component cooling water (CCW) system. This letter also contained a description of the Cygna concern and the Westinghouse 10CFR21 report on Westinghouse designed CCW systems. In order to ensure that the conclusions contained in that letter were properly communicated, the following is provided to further clarify this comparison.

Westinghouse states that the limiting in-leakage to the CCW system is the rupture of a tube in one of the system heat exchangers and that this is typically the rupture of a tube in the reactor coolant pump thermal barrier. Since Westinghouse designs utilize a single flow control valve to isolate this leakage in containment, TUGCO has determined that this specific limiting condition can only exist if a single failure of this valve occurs. The Cygna concern is also initiated by a single failure of the automatic isolation valve used to isolate a ruptured reactor coolant pump thermal barrier. Therefore, even though the end results of the Westinghouse and Cygna scenarios are different, Cygna concurs with TUGCO's assessment that they could be initiated from the same event.

San Francisco Boston Chicago Richland

8411040509 841022  
PDR ADOCK 05000445  
S PDR

*2222 - Per S. Burwell  
3/1 See Attached*



Mr. S. Burwell/Mr. J. B. George  
84056.035  
Page 2

As previously stated in the referenced letter, TUGCO has assured Cygna that they are addressing single failure requirements and the generic concerns raised by Cygna to resolve this issue in their 50.55(e) report.

In accordance with our assessment procedures regarding closure of potential findings, this letter and the reference letter serve as a basis for Cygna's closure of this issue. Should you have any questions or require any additional information on this subject, please do not hesitate to call.

Very truly yours,

A handwritten signature in cursive script that reads "N. H. Williams".

N. H. Williams  
Project Manager

NHW/acr

cc: Mr. D. Wade (TUGCO)  
Mr. D. Pigott (Orrick, Herrington & Sutcliffe)  
Mrs. J. Ellis (CASE)  
Mr. S. Treby (USNRC)  
Ms. J. Van Amerongen (EBASCO/TUGCO)  
Mr. R. Ballard (Gibbs & Hill)

TO: DOCUMENT CONTROL

FROM: S. B. Burwell x 27563

SUBJECT: Cygna Review (Phase 4) Comanche Peak

Attached is the following document:

October 22, 1984 - 840560035

Reactor coolant pump thermal barrier re: [redacted]  
Cygna (Williams) to NRC (Burwell) and Tu [redacted] (30)