

TU ELECTRIC

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January 13, 1997

C. Lance Terry  
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
LARGE BREAK LOCA ANALYSIS 10CFR50.46 REPORT

- REF: 1. Letter from R. A. Copeland (SPC) to Director of Nuclear Reactor Regulation, "Annual Reporting of Changes and Errors in ECCS Evaluation Models, RAC:94:019," dated February 14, 1994.
2. Letter logged TXX-96517, dated November 29, 1996, from C. L. Terry to the Nuclear Regulatory Commission.

Gentlemen:

On February 14, 1994, Siemens Power Corporation (SPC) reported an error in the Z-equivalent parameter used in the FCTF correlation present in one of the large break LOCA analysis codes (TOODEE2) in an annual report to the NRC (see Reference 1) and elected not to correct it.

On December 12, 1996, TU Electric determined that the error in the Z-equivalent parameter used in the FCTF correlation would change the calculated peak clad temperatures (PCT) by more than 50°F and is therefore significant and reportable for both CPSES Units 1 and 2. Pursuant to 10CFR50.46, TU Electric herein reports a significant error in the large break LOCA analyses for Units 1 and 2.

The (Z-equivalent) error itself was discussed in Reference 1. The error is in the conservative direction and correcting it would lower the PCTs for both units. TU Electric is not correcting the error in the methodology at this time because the error is in the conservative direction and SPC is developing methodology improvements that address this issue which will be available to TU Electric.

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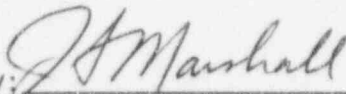
As a result, the current, previously reported PCTs remain unchanged and therefore include this error as a penalty (see Reference 2). The current LBLOCA PCTs of record for CPSES Units 1 and 2 are 2013°F and 2072°F, respectively. Based on preliminary evaluations, the PCTs with a corrected TOODEE2 code would have resulted in a decrease of 100°F for Unit 1 and 53°F for Unit 2. TU Electric accepts the penalties associated with using the uncorrected TOODEE2 code and no reduction in PCT will be credited as a result of this error. Therefore, the values for PCT for CPSES Units 1 and 2 remain at 2013°F and 2072°F, respectively, and the conclusion of the analyses presented in FSAR Section 15.6.5 remains valid.

Since the error in the large break LOCA methodology is conservative for CPSES Units 1 and 2, TU Electric plans to continue use of this methodology without corrections until the NRC approves the SPC methodology improvements to the large break LOCA analysis. TU Electric proposes to reanalyze the large break loss of coolant accident for Units 1 and 2 within one year following the NRC approval of the SPC methodology improvements.

Should you have any questions concerning this report, please contact Mr. J. D. Seawright at (817) 897-0140.

Sincerely,

C. L. Terry

By:   
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J. S. Marshall  
Generic Licensing Manager

JDS/grp

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