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March 15, 1988

William G. Counsil  
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-445  
STEAM GENERATOR TUBE RUPTURE ANALYSIS  
TOPICAL REPORT RXE-88-101

- REFERENCE:
1. R. N. Lewis, et al., "SGTR Analysis Methodology to Determine the Margin to Steam Generator Overfill", WCAP-10698-P-A, Westinghouse Electric Corporation.
  2. R. N. Lewis, et al., "Evaluation of Offsite Radiation Doses for a Steam Generator Tube Rupture Event", Supplement 1 to WCAP-10698-P-A, Westinghouse Electric Corporation.
  3. Nuclear Regulatory Commission letter to Westinghouse Owners' Group, SGTR Subgroup, "Acceptance for Referencing of Licensing Topical Report WCAP-10698, Supplement 1, 'Evaluation of Offsite Radiation Doses for a Steam Generator Tube Rupture Accident', December 17, 1985.
  4. Nuclear Regulatory Commission letter to Westinghouse Owners' Group, SGTR Subgroup, "Acceptance for Referencing of Licensing Topical Report WCAP-10698 'SGTR Analysis Methodology to Determine the Margin to Steam Generator Overfill', December, 1984", March 30, 1987.

Gentlemen:

TU Electric is required to re-evaluate the Steam Generator Tube Rupture (SGTR) event presented in Chapter 15 of the CPSES Unit 1 Final Safety Analysis Report (FSAR) to resolve a License Condition (18) for CPSES Unit 1. Because similar requirements were imposed on all Westinghouse NTOL plants, TU Electric joined with other utilities to form a subgroup of the Westinghouse Owners Group (WOG) to generically address the issues related to the postulated SGTR event.

The WOG analytical approach and the results of a design-basis analysis performed for a reference plant design were provided in two reports submitted to the NRC by the WOG (References 1 and 2). In December of 1985 and March of 1987, the NRC issued the Safety Evaluation Reports (SERs) on these submittals (References 3 and 4); however, as was noted in the SERs, the SGTR issues could

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not be wholly resolved on a generic basis. Due to the differences in the various plant designs, atmospheric dispersion factors, operating procedures and operator training, the NRC required that plant-specific analyses be performed to resolve the issue.

TU Electric performed the necessary additional analyses of the postulated SGTR event using methods and models specific to CPSES Unit 1. The topical report describing the analytical methods and analysis results is enclosed with this letter and is intended to satisfy the plant-specific requirements delineated in the above SERs, with the exception of the structural adequacy of the main steamlines under water-filled conditions, which will be addressed separately.

As part of the additional evaluations performed, the plant design and operating procedures were reviewed to evaluate their effects on the timely termination of the event. The required plant modifications and procedural improvements identified during this review will be completed prior to the initial criticality of CPSES Unit 1.

Enclosed is a copy of Report No. RXE-88-101-P, "Design Basis Analysis of a Postulated Steam Generator Tube Rupture Event for Comanche Peak Steam Electric Station, Unit 1" (Proprietary).

Enclosed is a copy of Report No. RXE-88-101-NP, "Design Basis Analysis of a Postulated Steam Generator Tube Rupture Event for Comanche Peak Steam Electric Station, Unit 1" (Non-Proprietary).

Also enclosed is a Westinghouse Application for Withholding, CAW-88-018, Accompanying Affidavit, and Proprietary Information Notice.

As this submittal 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.

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Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR2.790 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-88-018 and should be addressed to R. A. Wiesemann, Manager Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230.

Very truly yours,

*W. G. Council*

W. G. Council

By: *D. R. Woodlan*

D. R. Woodlan  
Docket Licensing Manager

JDS/grr  
Attachments  
Enclosures

c-Mr. R. D. Martin, Region IV  
CPSES Resident Inspectors, (3 copies)