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March 28, 1988

William G. Counsil
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
JUSTIFICATION FOR THE REMOVAL OF STEAM
GENERATOR TUBE VIBRATION INSTRUMENTATION

REF: TU Electric letter TXX-4130 dated March 12, 1984

Gentlemen:

The purpose of this letter is to inform you of our intent to remove the tube vibration instrumentation installed in the Comanche Peak Unit 1 steam generators as part of the vibration test program described in the referenced letter. This instrumentation plan has been described in Comanche Peak NUREG-0797 Supp. #3, subsection 5.4.2.2, NUREG-0797 Supp. #4 subsection 5.4.2.2 and Appendix H.

As part of the effort to address tube vibration and wear in the preheater section of Westinghouse preheat steam generators, selected steam generators were instrumented with accelerometers. This instrumentation was installed subsequent to a modification of the preheat section of the steam generators. The instrumentation was intended to provide a measurement of the vibration response of representative tubes for comparison with the objectives of the modification. The modification included expansion of selected tubes at the elevation of baffle plates and diverting a portion of the feedwater flow through the auxiliary feedwater nozzle.

One of the Comanche Peak Unit 1 steam generators was selected to be instrumented in anticipation of being the lead domestic Model D-4 steam generator to go into operation. As events have occurred, several other units with Model D-4/D-5 steam generators have started up and gone into operation before Comanche Peak. Therefore, operating experience with other units with Model D-4/D-5 steam generators and previous actions by the NRC would indicate that the use of the instrumentation at Comanche Peak is no longer required.

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Post modification testing of a foreign steam generator slightly larger in size, but with a similar preheater configuration, indicates that the modification successfully met the objectives. One of the NRC requirements resulting from the review of the modification was that the initial unit in operation with the modification have an in-service inspection of representative tubes after six months and before twelve months of full power operation. Several plants with Model D-4 steam generators have had in-service inspections after one or more cycles of operation. The results of eddy current tests on these steam generators have not included indications of accelerated wear.

The NRC has had extensive reviews of preheater tube vibration and modifications. In the Safety Evaluation Report (SER) related to the D4/D5/E Steam Generator Design Modification (NUREG 1014), the NRC Staff states that evaluation of the modification "indicates that the tube vibration and consequent wear will be reduced to an acceptable level as a result of these modifications". Additionally, the NRC has considered this issue as part of the evaluation of operation of other units. For example, in the SER related to operation of the Byron Station, Units 1 and 2, (NUREG 0876, Supplement 5), the Staff finds that the in-service inspection program provides for safe operation of Model D-4/D-5 steam generators and considers the issue closed.

In conclusion, we request concurrence for the elimination of vibration monitoring program on the basis presented in this letter, that is, elimination of the vibration monitoring program can be supported based on operating experience.

Very truly yours,

W. G. Cousins?

By: John W. Beck
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JLR/mgt

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