

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

February 23, 1988

Docket Nos. 10-445 and 50-446

Mr. William G. Counsil Executive Vice President Texas Utilities Electric Company 400 North Olive Street, Lock Box 81 Dallas, Texas 75201

Dear Mr. Counsil:

SUBJECT: WESTINGHOUSE ECCS MODELS - GENERIC LETTER 86-16

By letter dated May 18, 1987 (TXX-6444), you provided a response to Generic Letter 86-16, Westinghouse ECCS Evaluation Models (October 22, 1986). Your response maintains that the Generic Letter does not require an ECCS reanalysis for Comanché Peak Steam Electric Station (CPSES), Units 1 and 2, or for the planned CPSES Unit 2 FSAR amendment for optimized fuel assemblies. The staff has reviewed your response and agrees in part and disagrees in part with your position as discussed below.

The staff agrees with your position that reanalyses for Units 1 and 2 are not required. As stated in Generic Letter 86-16, the staff has accepted Westinghouse's assessment that the errors in the 1978 and 1981 ECCS Evaluation Models using WREFLOOD each result in a 6-12°F underprediction of peak clad temperature (PCT) and that there is ample margin for all facilities between the maximum PCT contained in 10 CFR 50.46 and the calculated PCT. You have affirmed that this is the situation for CPSES, Units 1 and 2, which have calculated PCTs of 2010.7°F and 1808°F, respectively. These are well below the 10 CFR 50.46 PCT limit of 2200°F. The staff will update Section 6.3.5 of the CPSES Safety Evaluation Report in a future supplement to reflect the staff's position.

Generic Letter 86-16 does not specifically refer to future submittals of analyses which were performed using the 1978 and 1981 versions of the model with WREFLOOD, but not using BART, because Westinghouse indicated to the staff that the 1978 and 1981 models with WREFLOOD would not be modified or used in future ECCS analyses. For that reason, the staff addressed only the 1981 version of WREFLOOD with BART in its August 25, 1986 evaluation of Topical Report WCAP 9561, Addendum 3, Revision 1, "Thimble Modeling in Westinghouse ECCS Evaluation Model." The staff understands that the planned CPSES Unit 2 FSAR amendment for optimized fuel assemblies is to be supported by the 1981 version of the Westinghouse ECCS Evaluation Model using WREFLOOD, but not using BART, which was prepared prior to Westinghouse identifying the errors discussed above. Since this analysis was performed a number of years ago and has yet to be submitted, the CPSES Unit 2 FSAR amendment for optimized fuel assemblies should be supported by an updated ECCS analysis.

Texas Utilities Electric Company - 2 - Mr. William G. Counsil

Should you have any questions regarding this evaluation, please contact Melinda Malloy (301-492-0738) or Annette Vietti-Cook (301-492-0737), Project Managers for the CPSES.

Sincerely.

Christopher I. Grimes, Director Comanche Peak Project Division Office of Special Projects

cc: See next page

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