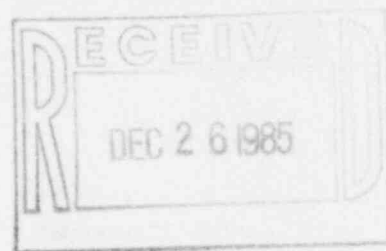


**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER · 400 NORTH OLIVE STREET, L.B. 81 · DALLAS, TEXAS 75201

Log # TXX-4658  
File # 10110

WILLIAM G. COUNSIL  
EXECUTIVE VICE PRESIDENT

December 20, 1985



Mr. Eric H. Johnson, Acting Director  
Division of Reactor Safety and Projects  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
DAMAGE STUDY EVALUATION OF WESTINGHOUSE  
SDAR: CP-85-46

Dear Mr. Johnson:

In accordance with 10CFR50.55(e), we are submitting the enclosed written report of actions taken to correct a deficiency involving high energy piping analyzed by Westinghouse. Postulated longitudinal line breaks were not evaluated by the damage study group. Evaluation of this issue has identified a reportable condition under the provisions of 10CFR50.55(e) involving interactions in the pressurizer surge line.

Very truly yours,

*W. G. Council*

W. G. Council

By: *J. W. Beck*  
J. W. Beck  
Vice President

JCH/grr  
Attachment

c - NRC Region IV (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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PDR ADOCK 05000445  
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## ATTACHMENT

### DAMAGE STUDY EVALUATION OF WESTINGHOUSE ANALYZED PIPING

#### DESCRIPTION

In the analysis (by Westinghouse) of high-energy piping, circumferential and longitudinal breaks were assumed to occur at high intermediate stress points. Programmatically, the site Damage Study Group has evaluated circumferential pipe breaks. The site evaluation of longitudinal breaks has occurred only in the instances in which these breaks have been specifically identified by the analysis organization.

Based upon a review of previous analysis results, Westinghouse was requested to provide clarification regarding a number of specific longitudinal breaks. The response resulted in a site Damage Study evaluation and the identification of unacceptable pipe break interactions.

Additional detailed analysis by Westinghouse indicated unacceptable interactions exist in the pressurizer surge line which originates at the reactor coolant loop and terminates at the pressurizer. The interactions involve a possible loss-of-coolant incident and damage to secondary side lines (SG blowdown and feedwater).

The concern is applicable to Unit 1 only.

#### SUMMARY OF EVENTS

Date Discovered: October 28, 1985 by DRR-117

Date NRC Notified as Potentially Reportable: October 29, 1985

Interim Report to NRC: November 20, 1985

Date Determined Reportable: December 19, 1985

#### SAFETY IMPLICATION

In the event the conditions had remained undetected and the unanalyzed longitudinal breaks had occurred, the operator's ability to safely control plant operations during accident conditions could be impaired.

#### CORRECTIVE ACTION

Evaluations are currently underway to resolve the unacceptable interaction through additional analysis techniques or the incorporation of physical protective structures. These efforts have been identified as a prerequisite to Fuel Load and will be completed accordingly.