

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

February 28, 1986

WILLIAM G. COUNSEL
EXECUTIVE VICE PRESIDENT

Director of Nuclear Reactor Regulation
Attention: Mr. Vince S. Noonan, Director
Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
USE OF ASME CODE EDITION AND ADDENDA

REF: 1) TUGCo letter TXX-4387 from J. Beck to B. Youngblood, dated
December 21, 1984
2) NRC letter from V. Noonan to M. Spence, dated July 3, 1985

Dear Mr. Noonan:

In Reference 1, Texas Utilities Generating Company (TUGCo) requested NRC approval for use in pipe support design activities of certain paragraphs and tables from subsection NF of the ASME Code set forth in edition and addenda later than the code of record. In Reference 2, the NRC requested certain additional information pertaining to TUGCo's request.

As the staff is aware TUGCo has since initiated a comprehensive program which will include the structural qualification of ASME Code Class 1, 2 and 3 pipe supports and Class 2 and 3 piping. This effort is being conducted by Stone & Webster Engineering Corporation (SWEC) and will replace support design activities for which the original request was submitted. The SWEC analyses will become the CPSES analyses of record.

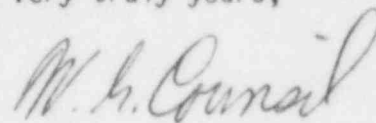
As an independent design analyst, SWEC will employ design practices and criteria, including computer codes and ASME Code provisions and cases, appropriate for its independent qualification. Details of the bases used by SWEC in this effort will be provided in a forthcoming submittal for NRC consideration.

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In view of the SWEC program, consideration of TUGCo's original request is no longer necessary. Accordingly, TUGCo hereby withdraws that request.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. G. Council".

W. G. Council

BSD/arm

Original plus 40 copies

c - A. Vietti-Cook