



Log # TXX-88724  
File # 10110  
903.8  
Ref. # 10CFR50.55(e)

William G. Counsil  
Executive Vice President

October 6, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RHR HEAT EXCHANGER SUPPORT DESIGN  
SDAR: CP-88-34 (FINAL REPORT - UNIT 1)  
(INTERIM REPORT - UNIT 2)

Gentlemen:

On September 6, 1988, we verbally notified your Mr. H. S. Phillips of a potentially reportable deficiency in the support configuration of the residual heat removal (RHR) heat exchangers. After further evaluation we have concluded this deficiency is reportable under the provisions of 10CFR50.55(e) and the required information follows.

#### DESCRIPTION

The purchase specification supplied to the Nuclear Steam Supply System (NSSS) vendor indicated that the RHR heat exchangers would be mounted on rigid supports. However, design validation of the RHR heat exchanger supports indicated that the support final design and as-built construction were not rigid. An analysis was performed to determine if the RHR heat exchangers could still be qualified when considering the degree of non-rigidity in the supports. This analysis showed that the degree of non-rigidity in the supports resulted in an overstressed condition in the heat exchanger shell at the mid-lug connection.

This deficiency was caused by failure of the original design organization to design rigid supports for the RHR heat exchangers.

#### SAFETY IMPLICATION

The RHR heat exchangers are utilized to establish and maintain cold shutdown conditions following postulated events. A failure in the shells for both RHR heat exchangers following a seismic event may result in the inability to achieve and maintain a cold shutdown.

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CORRECTIVE ACTION

Modifications to establish the necessary degree of rigidity in the RHR heat exchanger supports have been approved and will be implemented. The organization that provided the original design for the RHR heat exchanger supports is no longer providing design services to CPSES. The activities necessary to determine the applicability of this problem to Unit 2 have not been completed. The Unit 2 review and any required corrective action will be completed prior to Unit 2 fuel load. Our next report for Unit 2 will be submitted by December 29, 1989. Unit 1 corrective action will be completed by December 31, 1988.

Very truly yours,

*W.G. Council*

W. G. Council

By:

*J. S. Marshall*

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Generic Licensing Manager

CBC/mlh

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